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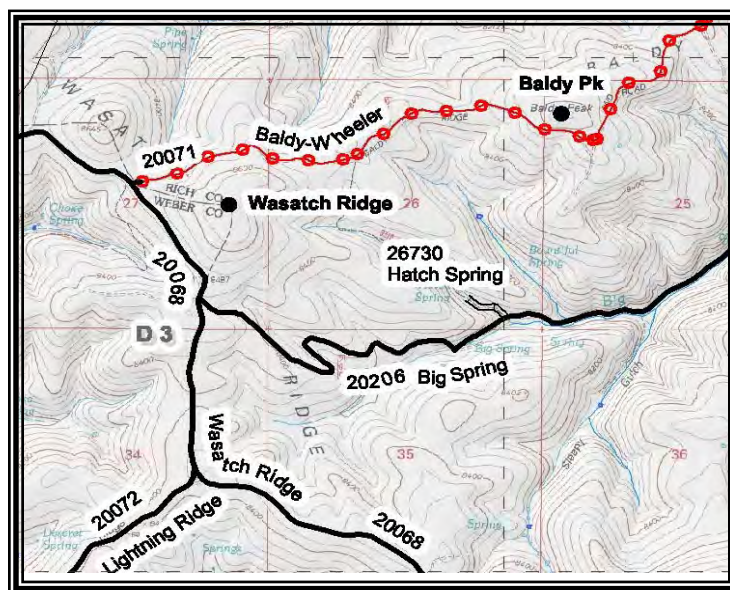
Uinta-Wasatch
-Cache National
Forest

March 2015



Final Supplemental Environmental Impact Statement

Ogden Ranger District Travel Plan Revision FEIS



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**FINAL SUPPLEMENTAL
ENVIRONMENTAL IMPACT STATEMENT**

To the

**OGDEN RANGER DISTRICT
TRAVEL PLAN REVISION
SEPTEMBER 2007**

Box Elder, Cache, Morgan, Weber and Rich Counties, Utah

Lead Agency:

USDA Forest Service

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ABSTRACT:

This Final Supplemental Environmental Impact Statement (“2015 FSEIS”) presents additional analysis to supplement information presented in the Ogden Ranger District Travel Plan Revision Final Environmental Impact Statement (FEIS) and 2007 Supplemental Environmental Impact Statement (“2007 ROD/FSEIS”) particularly in the three deficiencies identified by the March 7, 2012 United States District Court for the District of Utah decision order. The Court held that the record of decision and environmental impact statement had these deficiencies: (1) It failed to provide notice of available support for the public to understand the information cataloging illegal routes; (2) it failed to adequately support its assumptions about the impact of illegal user-created routes; and (3) it failed to explain explicitly its evaluation of the cumulative impacts of its decision on the Shoshone Trail system. As a result, the currently proposed supplement to the previous environmental analysis will be directed to address these deficiencies.

The FEIS documents the analysis of the same six alternatives that were considered in the Travel Plan Revision for the Ogden Ranger District: Alternative 1 was designed primarily to consider the values inherent in inventoried roadless areas. Alternative 2 was designed to emphasize a variety of motorized recreation and access opportunities. Alternative 3 was designed to consider important aspects of wildlife habitat management. Alternative 3a is the preferred alternative in the Draft EIS that balances considerations in Alternatives 1 through 3, emphasizing wildlife habitat as in Alternative 3, but also providing for very important access needs to private lands and for administrative purposes. Alternative 4 is the “No Action” Alternative that would continue current management under the existing Ogden Travel Map. Alternative 5 was formulated from additional public comments and analysis.

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INTRODUCTION

Background

In July 2003, the Forest Service announced a proposal to update the Ogden Travel Plan, and on March 31, 2004, it published an official Notice of Intent to prepare an environmental impact statement (“Notice”) in the Federal Register. The Notice explained that increasing demand for motorized recreation necessitated the Travel Plan revision.

In December 2004, the Forest Service released the Ogden Ranger District Travel Plan Draft Environmental Impact Statement (“DEIS”), which was followed by a period of briefings, meetings, and field trips to gather comments from the public and interested local groups.

In a March 20, 2006 Record of Decision and Final Environmental Impact Statement, District Ranger Chip Sibbernson decided to implement Alternative 5 for the Ogden Ranger District Travel Plan. Four appeals were received requesting a review of his decision at a higher administrative level. Following the review on June 30 2006, Forest Supervisor Faye Krueger reversed Ranger Sibbernson’s decision based on her finding that the environmental analysis was not adequate to support the decision in regard to cumulative effects analysis.

In response to Krueger’s decision, the Forest Service created a Draft Supplemental Environmental Impact Statement which was issued on March 21, 2007. Following the public comment period, the Forest Service issued the Ogden Ranger District Travel Plan Revision Record of Decision and Final Supplemental Environmental Impact Statement (“2007 ROD/FSEIS”). This 2007 ROD/FSEIS did not replace the previous environmental analysis entirely, but supplemented and replaced discrete sections.

The 2007 ROD/FSEIS was signed on September 12, 2007. It was appealed but Supervisor Krueger approved the decision. After the denial of their appeal, four local groups filed a Petition for Review of Agency Action and Complaint for Injunctive and Declaratory Relief with the United States District Court, District of Utah, Central Division on September 30, 2009.

On March 7, 2012, United States District Judge Clark Waddoups remanded the 2007 Decision to the Forest Service for additional documentation and analysis. By opinion of the court, the status quo as of March 7, 2012 shall be maintained until such time as the environmental impact statement is amended to address the deficiencies identified by the court.

As a result, the Draft SEIS was subsequently prepared to provide additional analysis to address the deficiencies and supplement information that was presented in the previous environmental analysis. The Draft SEIS was made available for public comment on September 12, 2014.

The Final Supplemental Environmental Impact Statement (“2015 FSEIS”) does not replace previous analysis for the Ogden Ranger District Travel Plan Revision in its entirety. Instead, information contained in the 2015 FSEIS replaces discrete sections of and provides additional information to supplement the analysis that was presented previously.

Scope of the Final Supplement

This 2015 FSEIS presents additional analysis to supplement information presented in previous environmental analysis for the Ogden Ranger District Travel Plan Revision particularly in the three deficiencies identified by the March 7, 2012 United States District Court for the District of Utah decision order. The Court held that the 2007 ROD/FSEIS these deficiencies: (1) It failed to provide notice of available support for the public to understand the information cataloguing illegal routes; (2) it failed to adequately support its assumptions about the impact of illegal user-created routes; and (3) it failed to explain explicitly its evaluation of the cumulative impacts of its decision on the Shoshone Trail system. As a result, the currently proposed supplement will be directed to address these deficiencies.

A supplemental document (40 CFR 1502.9 (b) (3), FSH 1909.15 § 18) can provide additional clarification of the previous analysis. This 2015 FSEIS presents additional analysis to supplement information presented in the previous environmental impact statement documents, particularly in the disclosure of effects from illegal routes.

This document does not replace the previous environmental analysis in its entirety. Instead, information provided in the 2015 FSEIS will replace discrete sections and provide additional information to supplement the analysis previously presented. Some sections of this document refer to maps, appendices, or other information contained in the Ogden Travel Plan Revision FEIS.

The Ogden Ranger District Travel Plan Revision FEIS and 2007 FSEIS are available on the Uinta-Wasatch-Cache National Forest website at:

<http://www.fs.usda.gov/project/?project=45226>

A paper copy of the FSEIS, the draft ROD, and any additional documents or information may be obtained by contacting Sendi Kalcic, NEPA Coordinator, at (435) 755-3633 or at sendikalcic@fs.fed.us.

This project implements the Revised Forest Plan [for the] Wasatch-Cache National Forest and is subject to the predecisional administrative review process found at 36 CFR 218, subparts A and B, also known as the objection process. Persons who submitted specific written comments during scoping, the comment period, or other public involvement opportunity and who meet the requirements found at 36 CFR 218.5 are eligible to file an objection when the draft record of decision and the final SEIS are released for public review.

The following sections describe the purpose and need for action as well as the activities proposed to accomplish those needs. There has been no change in the purpose and need for action since the preparation of the FEIS. Corrections and clarification of information previously presented in chapters 1 through 4 follow this summary, followed by the supplemental analysis of effects.

Purpose and Need for Action

For more detail about the purpose and need for action, please see pages 1-2 Section 1.3.1 in the Ogden Ranger District Travel Plan Revision FEIS.

Alternatives, Including the Proposed Action

This FSEIS documents supplemental analysis of the same six alternatives considered in the Ogden Travel Plan Revision FEIS. These alternatives are summarized below and described in detail in Chapter 2 of the Ogden Travel Plan Revision FEIS. Differences between the alternatives are summarized below.

Alternative 1

Alternative 1 is designed to divert motorized use away from inventoried roadless areas in order to preserve their integrity and to minimize motorized impacts on other resources including wildlife habitat, watershed protection and public appreciation of the forest. This alternative emphasizes the value and importance of maintaining roadless and non-motorized landscapes. It focuses on protecting inventoried roadless areas and concentrating motorized recreation in areas where this type of use is already occurring.

Alternative 2

In Alternative 2, travel route management proposals were based on providing additional and improved motorized recreation opportunities. This alternative has new routes proposed that would create loop trails using the existing system of roads. It also allows public use on routes that in the past were closed, open only for administrative use, or were not on the previous travel plan as an open route. This alternative responds to the public comment for additional motorized routes.

Alternative 3

Alternative 3 was created in response to the numerous comments from the scoping process on the negative effects of motorized recreation on wildlife populations and habitat. This alternative provides an array of road and motorized trail experiences while minimizing or reducing the effects to a broad range of wildlife species and their habitats. Alternative 3 concentrates motorized access in areas where these activities are presently occurring, while reducing existing routes or avoiding new trail and road construction in areas that are more isolated, have less disturbance, and provide generally higher quality wildlife habitat. This alternative also minimizes the creation of new roads and motorized trails within the forest carnivore habitat/corridor especially within the Curtis Creek and Monte Analysis areas.

Alternative 3a (DEIS Preferred)

This alternative is similar to and derived from Alternative 3, the wildlife emphasis alternative, but with some different actions on a limited number of routes. This difference is primarily due to administrative need or to emphasize another resource in specific areas. Substantial additional interdisciplinary analysis went into the development of this alternative considering tradeoffs between the various alternatives and there was considerable line officer input.

Alternative 4 (No Action)

Under Alternative 4, the existing 2004 Wasatch-Cache National Forest Travel map for the Ogden and Logan Ranger Districts would determine the status of most of the system of routes. Although there are other routes that exist and are being used by the public, the No Action alternative would

aggressively manage routes limiting the transportation system to only those roads on the current Travel Plan map and any road used for administrative access.

Alternative 5 (FEIS Preferred)

Alternative 5 was developed by the Forest Service after public comments on the five alternatives described in the draft environmental impact statement had been reviewed. The purpose was to improve resolution of issues raised in public comments. Most of the actions to roads and trails of the DEIS Preferred Alternative 3a were retained.

Table 1a. Comparison of proposed treatments for alternatives 1, 2, 3, 3a, 4 and 5.

	Alternative 1	Alternative 2	Alternative 3	Alternative 3a (DEIS Preferred)	Alternative 4	Alternative 5 (FEIS Preferred)
Route Status	Miles	Miles	Miles	Miles	Miles	Miles
Open Road*	187	206	202	208	198	202
Closed Route*	56	48	56	50	66	50
Motorized Trail*	39	61	35	49	46	58
Non-Motorized Trails*	141	107	128	116	110	113
Unauthorized routes*	97	97	97	97	97	97
Total**	520	519	518	520	517	520
Miles of Open roads and Motorized Trails	226	267	237	256	244	260
Miles of Seasonal Closures	1	8	5	11	7	13
Miles of Administrative Closures	53	49	61	57	51	60
Miles open without any closures	171	210	171	189	185	187
Miles of new Open Motorized trails	34	29	10	13	0.00	18
Miles of Unauthorized Routes found in updated analysis to be reclaimed***	97	97	97	97	97	97
Number of New Gates	11	10	11	9	0	15
Number of Relocated Gates	1	2	1	2	0	2
Significant Issues to which Alternatives Respond	Alternative Emphasis	Alternative Emphasis	Alternative Emphasis	Alternative Emphasis	Alternative Emphasis	Alternative Emphasis
Motorized activities negatively affect wildlife habitat	Moderate protection of wildlife habitat.	Least protection of wildlife habitat.	Best protection of wildlife habitats.	Good protection of wildlife habitat.	Moderate protection of wildlife habitat.	Good protection of wildlife habitat.
Motorized activities negatively affect regional wildlife corridor	Good protection of wildlife corridor.	Least protection of wildlife corridor.	Best protection of wildlife corridor.	Good protection of wildlife corridor.	Good protection of wildlife corridor.	Good protection of wildlife corridor.
Negative effects to roadless areas	Best protection of roadless areas values.	Least protection of roadless areas values.	Good protection of roadless areas values.	Good protection of roadless areas values.	Good protection of roadless areas values.	Good protection of roadless areas values.
Inadequate range of trail-based recreation opportunities	Good range of motorized trails opportunities.	Best range of motorized trails opportunities.	Least range of motorized trails opportunities.	Good range of motorized trails opportunities.	Moderate range of motorized trails opportunities.	Good range of motorized trails opportunities.

*Open Road: Roads open to motorized use, seasonally closed, administrative use only, county and state jurisdiction; Closed route: system routes already closed or will be closed to public use and will be removed from the road management system; Motorized trails: existing and new proposed trails open to motorcycles or ATVs; Unauthorized routes: routes created by users or previous land owners which will not be managed as part of the Forest Service transportation system.

**Approximate mileage within plus or minus one mile.

***Unauthorized routes digitized from 2010 (9.84 inch) high resolution orthophotography. Miles of Unauthorized routes do not change by Alternative because the new inventory included the 2007 data files which identified routes proposed to be included or changed to other route categories. The previously identified miles of unauthorized routes in addition to miles of newly inventoried unmapped travel features may be reclaimed above this amount.

Chapter 1

Purpose and Need

Add the following section “1.3.2.5 Code of Federal Regulations” on page 1-10 10 in the Ogden Travel Plan FEIS.

New Criteria for designation of roads, trails, and areas has been provided on a national level to aid the Ranger Districts in minimizing environmental impacts caused by motorized recreation activities.

§ 212.55 Criteria for designation of roads, trails, and areas.

- (a) General criteria for designation of National Forest System roads, National Forest System trails, and areas on National Forest System lands. In designating National Forest System roads, National Forest System trails, and areas on National Forest System lands for motor vehicle use, the responsible official shall consider effects on National Forest System natural and cultural resources, public safety, provision of recreational opportunities, access needs, conflicts among uses of National Forest System lands, the need for maintenance and administration of roads, trails, and areas that would arise if the uses under consideration are designated; and the availability of resources for that maintenance and administration.
- (b) Specific criteria for designation of trails and areas. In addition to the criteria in paragraph (a) of this section, in designating National Forest System trails and areas on National Forest System lands, the responsible official shall consider effects on the following, with the objective of minimizing:
 - (1) Damage to soil, watershed, vegetation, and other forest resources;
 - (2) Harassment of wildlife and significant disruption of wildlife habitats;
 - (3) Conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands or neighboring Federal lands; and
 - (4) Conflicts among different classes of motor vehicle uses of National Forest System lands or neighboring Federal lands.In addition, the responsible official shall consider:
 - (5) Compatibility of motor vehicle use with existing conditions in populated areas, taking into account sound, emissions, and other factors.
- (c) Specific criteria for designation of roads. In addition to the criteria in paragraph (a) of this section, in designating National Forest System roads, the responsible official shall consider:
 - (1) Speed, volume, composition, and distribution of traffic on roads; and
 - (2) Compatibility of vehicle class with road geometry and road surfacing.
- (d) Rights of access. In making designations pursuant to this subpart, the responsible official shall recognize:
 - (1) Valid existing rights; and

(2) The rights of use of National Forest System roads and National Forest System trails under § 212.6(b).

(e) Wilderness areas and primitive areas. National Forest System roads, National Forest System trails, and areas on National Forest System lands in wilderness areas or primitive areas shall not be designated for motor vehicle use pursuant to this section, unless, in the case of wilderness areas, motor vehicle use is authorized by the applicable enabling legislation for those areas.

Add these items to Table 1.6.1 Significant Issues and Indicators on page 1-13 and 14 of the Ogden Travel Plan FEIS.

Table 1.6.1 Significant Issues and Indicators

Legal Issues	
The FEIS failed to provide notice of available support for the public to understand the information cataloguing illegal routes	The FEIS and SEIS did not disclose the location and inventory of the routes designated as Unauthorized Route. This would include user-created illegal routes. This Draft Supplemental Environmental Impact Statement will disclose the 2012 Unauthorized routes inventory digitized from 2010 (9.84 inch) high resolution orthophotography and statistically field reviewed during the summer of 2012. This disclosure will be in the form of GIS maps for each Analysis Area.
The FEIS failed to adequately support its assumptions about the impact of illegal user-created routes;	The documentation of the unauthorized routes in the FEIS and SEIS assumed that no environmental impacts would occur because all routes would be closed and obliterated. This assumption did not take into consideration the difficulty and success of the Forest Service completely removing user-created routes. This Draft Supplemental Environmental Impact Statement will disclose effects by alternatives to each of the resources.
The FEIS failed to explain explicitly its evaluation of the cumulative impacts of its decision on the Shoshone Trail system	Additional explanation of the cumulative impacts caused by the Shoshone ATV Trail is included in this Draft Supplemental Environmental Impact Statement. This latest disclosure of effects will update the current management status of the motorized trail by the Ogden Ranger District.

Chapter 2 The Alternatives

Replace the following table in Section 2.7.1 on pages 2-12 and 2-13 of the Ogden Travel Plan FEIS. This updates the miles of unauthorized routes for the analysis. This new inventory of the unauthorized routes was digitized from 2010 (9.84 inch) high resolution orthophotography.

Table 2.7.1 provides a summary of some of the main differences between the alternatives, showing differing miles of routes for each and how the alternatives were designed to try to address significant issues. The differences and effects listed below are described in more detail in Chapter 4.

Table 2.7.1 Comparison of Alternatives

	Alternative 1	Alternative 2	Alternative 3	Alternative 3a (DEIS Preferred)	Alternative 4	Alternative 5 (FEIS Preferred)
Route Status	Miles	Miles	Miles	Miles	Miles	Miles
Open Road*	187	206	202	208	198	202
Closed Route*	56	48	56	50	66	50
Motorized Trail*	39	61	35	49	46	58
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Miles of Unauthorized Routes found in updated analysis to be reclaimed***	97	97	97	97	97	97
Number of New Gates	11	10	11	9	0	15
Number of Relocated Gates	1	2	1	2	0	2
Significant Issues to which Alternatives Respond	Alternative Emphasis	Alternative Emphasis	Alternative Emphasis	Alternative Emphasis	Alternative Emphasis	Alternative Emphasis
Motorized activities negatively affect wildlife habitat	Moderate protection of wildlife habitat.	Least protection of wildlife habitat.	Best protection of a range of wildlife habitats.	Good protection of wildlife habitat.	Moderate protection of wildlife habitat.	Good protection of wildlife habitat.
Motorized activities	Good	Least	Best	Good	Good	Good

negatively affect regional wildlife corridor	protection of wildlife corridor.	protection of wildlife corridor.	protection of wildlife corridor.	protection of wildlife corridor.	protection of wildlife corridor.	protection of wildlife corridor.
Negative effects to roadless areas	Best protection of roadless areas values.	Least protection of roadless areas values.	Good protection of roadless areas values.	Good protection of roadless areas values.	Good protection of roadless areas values.	Good protection of roadless areas values.
Inadequate range of trail-based recreation opportunities	Good range of motorized trails opportunities.	Best range of motorized trails opportunities.	Least range of motorized trails opportunities.	Good range of motorized trails opportunities.	Moderate range of motorized trails opportunities.	Good range of motorized trails opportunities.

*Open Road: Roads open to motorized use, seasonally closed, administrative use only, county and state jurisdiction; Closed route: system routes already closed or will be closed to public use and will be removed from the road management system; Motorized trails: existing and new proposed trails open to motorcycles or ATVs; Unauthorized routes: routes created by users or previous land owners which will not be managed as part of the Forest Service transportation system.

**Approximate mileage within plus or minus one mile.

***Unauthorized routes digitized from 2010 (9.84 inch) high resolution orthophotography. Miles of Unauthorized routes do not change by Alternative because the new inventory included the 2007 data files which identified routes proposed to be included or changed to other route categories. The previously identified miles of unauthorized routes in addition to miles of newly inventoried unmapped travel features may be reclaimed above this amount.

Add the following to section “2.5.16 History and Status of the Shoshone ATV Trail” on page 2-10 in the Ogden Travel Plan FEIS and page 2.1 in the SEIS.

Since the Final Decision in September 2007, the amount of recreation use on those routes included in the Shoshone ATV trail on the Ogden Ranger District have not noticeably increased or decreased. No new signs have been installed on the route specifically for the Shoshone Trail name. The unofficial parking areas have not changed in size in any way.

The junction of the Curtis Ridge Road #20059 and State Highway 39 is a major starting point for ATV and UTV use on the Shoshone system of routes. It is easier to unofficially monitor the current activities on the routes from motorized vehicles since most ATVs and UTVs are unloaded from their trailers at this point. Even on peak holiday weekends, this road junction does not become overcrowded and parked vehicles don’t spill into adjacent open areas.

The Ogden Ranger District has not needed to increase its Travel Management patrols or direct management of motorized recreation because of an increased draw caused by the Shoshone ATV trail.

There has not been any Special Use Permits issued for ATV group events or organized rides on the Ogden Ranger District. This includes and specifically illustrates the lack of attention from the general public on the Shoshone ATV trail.

At the Ogden Ranger District main office in downtown Ogden, Utah, visitors are given maps of the Shoshone ATV trail if motorized recreation is their topic of interest. At this time, we still have a number of boxes of the Shoshone ATV trail map printed by the State of Utah Division of Parks and Recreation. It is unknown that this map will be reprinted once they are gone.

Chapter 3 The Affected Environment

Add the following paragraphs on page 3-2 of the Ogden Travel Plan FEIS under the heading of 3.1.1 Travel Planning on the Ogden Ranger District.

- A Motor Vehicle Use map following the new national format was printed for the Ogden Ranger District in spring of 2008. The system of open routes was based on the 2007 FEIS decision.
- The Motor Vehicle Use map was reprinted in 2009 and 2012 with no changes.

On March 31, 2004, a Notice of Intent (“NOI”) was published announcing the district’s intention to prepare the EIS for the Ogden Travel Plan. The Record of Decision (“ROD”) was signed in 2006. It provided for management of summer-season, including types of vehicles that could be used on specific routes, seasonal restrictions on specific routes and routes that are open only for “administrative use” (law enforcement, infrastructure maintenance, permittee access, and fire protection).

Four appeals were filed. On June 30, 2006, Forest Supervisor Faye Krueger reversed the March 2006 decision because she found that the cumulative effects analysis was inadequate.

A NOI announcing the preparation of a supplement to the EIS was published on July 24, 2006 and a draft SEIS was released for comment on April 20, 2007. A ROD was signed by District Ranger Sibbersen on September 12, 2007. Three appeals were received on the SEIS. On December 17, 2007, Forest Supervisor Faye Krueger affirmed the 2007 decision.

On September 30, 2009, four groups (Sierra Club, Wild Utah Project, Western Wildlife Conservancy, and Citizens’ Committee to Save Our Canyons) appealed this decision, alleging that it violated the National Environmental Policy Act (“NEPA”). They filed a Petition for Review of Agency Action and Complaint for Injunctive and Declaratory Relief.

On March 7, 2012, United States District Judge Clark Waddoups remanded the 2007 Decision to the Forest Service for additional documentation and analysis. By opinion of the court, the status quo as of March 7, 2012 shall be maintained until such time as the environmental impact statement is amended to address the deficiencies identified by the court.

The draft SEIS was subsequently prepared and made available for public comment on September 12, 2014. It provided additional analysis to supplement information that was presented in the 2007 SEIS, specifically in regards to the three deficiencies identified in the March 7, 2012 court order.

Add the following paragraphs on page 3-4 of the Ogden Travel Plan FEIS under the heading of 3.2 Transportation System 3.2.2 Existing Condition.

Unauthorized Routes

The United States District Court order directed additional inventory and analysis of the impact of illegal user-created routes. In response to this order, the Forest Service initiated an inventory of unauthorized routes using the following methods.

Aerial imagery of the five Analysis Areas used in the Ogden Travel Plan was overlaid with a feature class consisting of a series of approximately 34,500 five-acre grid cells. Existing lines—including authorized roads and trails, unclassified roads from the 2007 environmental impact statement, and National Hydrography Dataset information, etc.—were added as well. Each five-acre grid cell was examined to see if it contained any possible unauthorized routes, trails, or other linear features that could be used by motorized vehicles but which were not already captured by an existing line feature class in GIS.

If a grid cell did not appear to contain any additional linear features that were not accounted for by existing lines, the corresponding column/cell in the attribute table of the feature class was assigned a value of “0.” If a grid cell appeared to contain a line that had the potential to be an unrecorded user-created route, or that could be used for access by a motorized vehicle, the corresponding column/cell was assigned a value of “1.”

Actual digitizing of potential new routes was completed at the Remote Sensing Application Center. Grid cells that had been assigned a value of 1—that is, grid cells that contained linear features that had been unaccounted for in the existing line features—were examined more closely. Most of these grid cells did contain features that were then digitized. However, after this secondary review, a small percentage of grid cells that initially had been assigned a value of 1 were found not to contain a possible trail that was 48-inches or wider, which was the threshold width for inclusion. Therefore, no lines were digitized in these grid cells.

Likewise, secondary review also identified a small number of areas that initially had been assigned a value of 0 but that actually contained linear features that appeared to meet the 48-inch criteria for inclusion. These linear features were digitized.

In addition to the obvious two-track routes that were digitized, linear features such as fence rows, short stream reaches, and utility corridors were digitized if it seemed that motorized use was evident, or in some cases if access to the linear feature could be made easily from existing routes.

This inventory identified 1123 separate unauthorized or unmapped features.

A statistical sampling of the features was completed during the summer of 2012 by Ranger District personnel. The purpose, methodology, and results of the individual surveys are presented below. These include closed road survey, unidentifiable user feature inventory, random routes field survey, and random perennial stream crossings field survey.

Summary of Results – The Unidentifiable User Feature Inventory (UUF) inventory resulted in 1,123 UUF segments delineated in GIS. A survey of 30 random UUFs indicates that about 60% of the UUFs were full size vehicle routes or ATV trails of which most were full size vehicle routes. The use on the full size vehicle routes (4X4>=60”) were mostly full size vehicles with

some ATV use, stock, and wildlife use. The remaining routes were stock or wildlife trails or hiking trails.

The closed road survey showed that about half of the roads are effectively closed. For roads that were not effectively closed, the use on these roads is mostly medium to frequent. For all of the roads that were effectively closed, most of the routes had low vegetative recovery, very little to no erosion, and no impacts to perennial streams. One road had extensive erosion due to poor drainage from the road because the road is incised for much of its length. A conclusion from the closed roads survey is roads are difficult to close when alternative travel routes are not close by, when the land is open and relatively level, and/or when roads are closed only at the beginning of the route and the route is not obliterated or brought back to contour. No closed roads were identified in GIS that crossed perennial stream channels.

The random sample of 20 UUF routes that crossed perennial stream were field checked. The results show almost 60 percent of the routes that cross perennial streams were trails for stock or wildlife. Eight crossings had erosion present and the severity of erosion was low or historic. Of the eight that had erosion, five had sediment entering the water and these occurred on a decommissioned road, a decommissioned trail, a full size vehicle route, a horse and cattle trail, and a ski area maintenance road. There does not appear to be a pattern of the type of use on the route with the amount of erosion or sedimentation. With the low amount of erosion from the roads, a low amount of sedimentation of the stream is expected.

Unidentifiable User Feature Inventory (UUF) and UUF Routes Random Sample Field Survey

Purpose of the Inventory – The purpose was to provide a comprehensive, current inventory of unidentifiable user features on the Ogden Ranger District and determine the accuracy of the inventory.

Method of Inventory – Unidentifiable user features (UUFs) are linear features identified from aerial photos that have the appearance of being a road or ATV trail and these are delineated in a geographical information system (GIS). Using the UUF inventory, a random sample of thirty UUFs was selected for field verification and on the ground conditions.

Results of Inventory – After the UUF layer was delineated it was compared to the roads GIS layer that was used in the 2007 Ogden Travel Plan SFEIS to determine which UUFs do or do not correspond to both data sets. The UUFs were very close to the location of the roads GIS layer that was used in the 2007 Ogden Travel Plan SFEIS so no changes were made to the locations of the roads in the GIS layer that was used in the 2007 Ogden Travel Plan SFEIS. For UUFs that did not correspond to the GIS road layer used in the 2007 Ogden Travel Plan SFEIS, the UUFs were delineated in a separate GIS layer (called the UUF Inventory) and there were 1,123 UUF delineated in this GIS layer. Of the UUFs that were delineated, the longest was 3.1 miles, the average length was 0.19 miles, 90 percent of them were less than 0.41 miles, and 50 percent of them were less than 0.11 miles. Most UUFs were short spurs from existing open roads.

In 2010-11, a UUF inventory was conducted on the Logan Ranger District and almost all of the UUFs were field checked. The results of this survey indicated that about 70% of the UUFs were

a road or trail. The random sample of 30 UUFs on the Ogden Ranger District had about 65% of the UUFs verified as roads or ATV trails which is similar to the results of the Logan RD field surveys.

A summary of field data collected from the random sample is presented in Table 3.2.2. Of the 30 random UUFs, four were not reviewed in the field because they had difficult access. The field survey of the remaining 26 UUFs showed that:

- 13 were full size vehicle routes (4X4>=60")
- 8 were cattle, sheep or deer trails
- 1 was an ATV trail
- 1 was a two-track route with no visible motor vehicle use
- 2 were hiking trails, and
- 1 was located on private land.

The current use for the UUFs that were identified as full size vehicle routes (4X4>=60") indicates that:

- 8 routes had full size vehicles use
- 2 routes had ATV use
- 1 route had cattle/sheep trail/deer trail use
- 1 route had horse use, and
- 1 route had other uses that were not able to be identified.

Bare soil on the road and sediment and erosion were associated only with full size vehicle and ATV routes.

Table 3.2.2. Summary of Unidentifiable User Features (UUF) from Random Sample

Object ID	Confidence	Trail Width	Current Uses	Use Level	Surface Type and Construction	Sediment/Erosion	Gully Erosion (Ft)	Comments
1	High	4X4>=60"	4x4 wheelbase >= 51"	High	>40% Bare Soil, Constructed	Yes	70	Many OHV routes
2	High	4X4>=60"	ATVs wheelbase <= 50"	High	>40% Bare Soil	Yes	60	Fresh ATV tracks
4	High	4X4>=60"	4x4 wheelbase >= 51"	Low	>60% mixed vegetation and rock		20	Evidence of some motor vehicle use
5	High	4X4>=60"	4x4 wheelbase >= 51"	High	>40% Bare Soil			Campsite
12	Low	Two track	ATVs wheelbase <= 50"	Low	>60% mixed vegetation and rock			
13	High	4X4>=60"	4x4 wheelbase >= 51"	High	>40% Bare Soil, Constructed			Accesses dispersed camp site
14	Low	4X4>=60"	4x4 wheelbase >= 51"	Low	>40% Bare Soil			
16	Low	4X4>=60"	4x4 wheelbase >= 51"	Low	>40% Bare Soil			Camp location
26	High	4X4>=60"	4x4 wheelbase >= 51"	High	>40% Bare Soil, Constructed	Yes		Service
27	High	4X4>=60"	4x4 wheelbase >= 51"	Low	>60% mixed vegetation and rock	Yes	100	
30	Low	4X4>=60"	ATVs wheelbase <= 50"	High	>40% Bare Soil	Yes	70	Joann spring
3	Low	Other	cattle/sheep trail/deer trail	Low	>60% mixed vegetation and rock			Fence line
7	Low		cattle/sheep trail/deer trail	Low	>60% mixed vegetation and rock		0	No visible motor vehicle tracks
8	Low		cattle/sheep trail/deer trail	Historic	>60% vegetation, Constructed			Timber sale area, historic
9	Low	Other	cattle/sheep trail/deer trail					
15	Low	Other	cattle/sheep trail/deer trail	Low	>60% mixed vegetation and rock			Elk trail
19	Low		cattle/sheep trail/deer trail					No trail, game?
20	Low	4X4>=60"	cattle/sheep trail/deer trail	Historic	>60% vegetation, Constructed			Rehabilitated road
28	Low	One track	cattle/sheep trail/deer trail	Low	>60% mixed vegetation and rock		0	Cattle trail
29	Low	One track	cattle/sheep trail/deer trail	Historic	>60% mixed vegetation and rock			
11	Low	4X4>=60"	Horse		>60% mixed vegetation and rock, Constructed	Yes	2	
17	Low	4X4>=60"	Other	Low	>60% mixed vegetation and rock	Yes	16	Trees down over route

18	Low	Two track		Historic	>60% vegetation			No visible motor vehicle use
23	Low		Hikers		>60% vegetation			Hiking
24	High		Hikers					Hiking
6	High	No field survey - difficult access						
10	Low	No field survey - difficult access						
21	Low	No field survey - difficult access						
22	Low	No field survey - difficult access						
25	High	Two track	4x4 wheelbase >= 51"	Low	>40% Bare Soil, Constructed	Yes	300	Not FS

Replace the following introduction and Table 3.7.2 on page 3-37 of the FEIS in section 3.7.4.

Table 3.7.2 displays the results of the most recent inventory of trails and open roads on the Ogden District. This includes private, county, city, state, and Forest Service routes including those implemented based on the 2007 Ogden Ranger District Travel Plan Record of Decision prior to the court action.

Table 3.7.2 Miles of Roads and Trails within the Boundary of the Ogden Ranger District

Analysis Area	Miles of Road	Miles of Non-motorized Trails	Miles of Motorized Trail
Curtis Creek	80	30	15
Monte Cristo and Wheat Grass	50	41	7
South Fork	9	3	0
Ogden Front & Pineview	32	33	17
Willard and Public Grove	24	10	29
Totals	195	117	68

Replace Table 3.10.2 on page 3-43 of the FEIS in section 3.10.3.

Table 3.10.2 Current Roads and Trails as they relate to Roadless Areas on the Ogden Ranger District

Roadless Area Name	Degree to which Road Cherry Stems negatively affect area integrity	Miles of Motorized Trails	Miles of Non-Motorized Trails	Miles of Unauthorized Routes	Miles of Trails and Routes per square mile	Total Miles of Trails and Routes
Mollens Hollow	Area is moderately affected by cherry stems	5.03	11.92	2.92	0.72	19.99
Rock Creek – Green Fork	Small area is heavily affected by 2 long cherry stems	0	1.04	1.9	0.34	2.94
Sugar Pine	Small area is moderately to heavily affected by 3 cherry stems	0	4.69	2.75	0.85	7.44
Upper South Fork	Area has very minor effects from 2 short cherry stems	0	23.14	2.97	0.97	26.11
Willard	Heavy affects by long cherry stem on north side	12.6	7.64	3.85	0.81	24.09
Lewis Peak	Area has only very minor intrusion from 1 cherry stem	12.05	3.52	2.94	0.91	18.51

Roadless Area Name	Degree to which Road Cherry Stems negatively affect area integrity	Miles of Motorized Trails	Miles of Non-Motorized Trails	Miles of Unauthorized Routes	Miles of Trails and Routes per square mile	Total Miles of Trails and Routes
Burch Creek	Area not affected by any cherry stems	0	9.32	0.36	0.90	9.68
Totals		29.68	61.27	17.69		108.76

* Cherry stems are defined in the Glossary.

Chapter 4 The Environmental Effects

4.1 Introduction

This chapter of the Ogden Travel Plan Final Supplemental Environmental Impact Statement (FSEIS) presents analysis to correct and improve information presented in Chapter 4 of the Ogden Travel Plan Final EIS (USDA Forest Service, 2006), particularly in the disclosure of cumulative effects.

This chapter does not replace Chapter 4 of the Ogden Travel Plan FEIS in entirety. Instead, information provided in this chapter will replace discrete sections of the FEIS or is an addition. Some sections of this document refer to maps, appendices, or other information contained in the Ogden Travel Plan FEIS (USDA Forest Service, March 2006).

The information in this chapter is a summary of project-specific reports, assessments, and input prepared by Forest Service specialists, which are incorporated by reference in this final supplemental environmental impact statement (FSEIS). These reports or memoranda are part of the project record on file at the Ogden Ranger District.

Replace table 4.1 Miles of Routes by Alternative (From GIS) on page 4-1 of the Ogden Travel Plan FEIS.

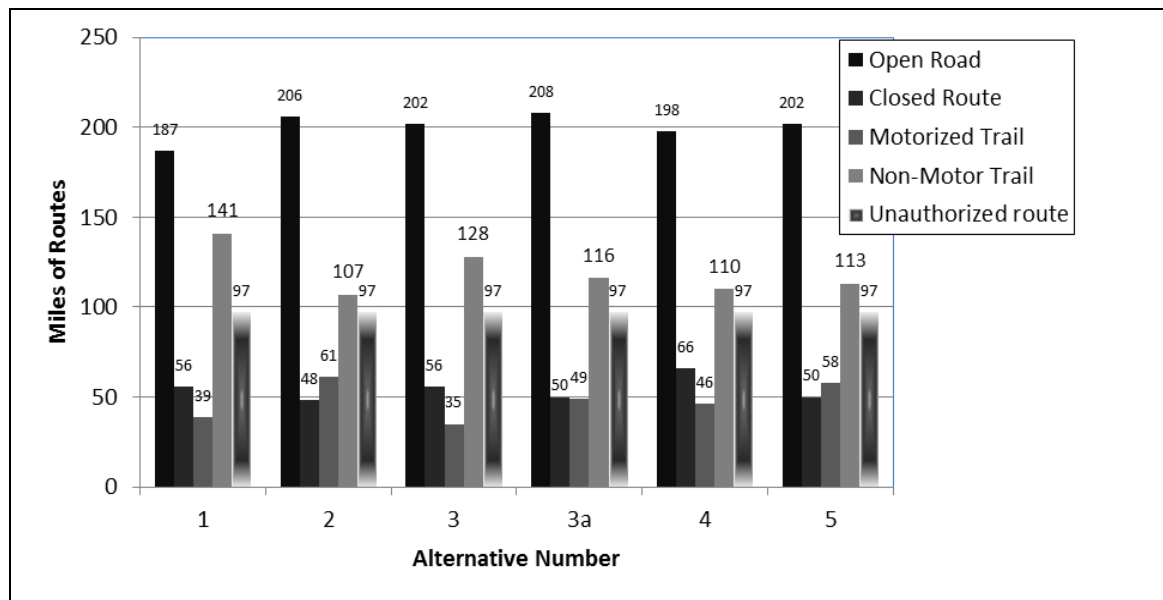


Figure 4.1 Miles of Routes by Alternative (From GIS).

Replace the definition of Unauthorized Routes in section 4.2.3 Effects Analysis Methods and Assumptions

Unauthorized Route: User created route that is not a part of the official system of roads or trails. Unauthorized routes digitized from 2010 (9.84 inch) high resolution orthophotography.

Add the following to section “4.3 Effects on Watersheds and Aquatic Resource” on page 4-3 to 4-11 in the Ogden Travel Plan FEIS.

4.3 Effects on Watersheds and Aquatic Resource

4.3.5.1 Effects Common to all Alternatives

The method of analysis is to assess the effects to sensitive water resources of the illegal routes currently on the Ogden District and determine the potential effect to sensitive water resources of illegal ATV route creation based on the disposition of the routes analyzed under each alternative. Information to determine where sensitive water features are located was from review of topography maps, aerial photography, and water rights database. Sensitive water resources are those that have perennial springs and wetlands that are greater than one acre or that support threatened, endangered or sensitive species and main perennial streams. The assessment of whether illegal routes will increase is based on where:

- topography such as relatively flat open terrain is conducive to ATV trail creation
- Vegetation that is conducive to ATV use.
- scenic viewpoints, stock ponds and other natural features occur that are desirable destinations for ATVs

Sensitive water resources on the Ogden Ranger District that have high probability of access based on slope and vegetation cover and the road or trail where access would occur are shown in Table 4.3.3. Table 2.7.2 Summary of Proposed Activities by Alternative in the 2006 Ogden Travel Plan FEIS presents alternatives that show the relative changes to the 2006 existing travel system of the Ogden Ranger District and is present in Appendix A of this document. Table 2.7.2 does not include changes to several main roads on the District and the status of these roads does not change by alternative. Table 4.3.3 include several roads that do not change by alternative but have sensitive water resources that have a high probability of access based on topography and vegetation density. These roads are Forest Road numbers 20060, 20059, 26109, 20028, 20216, 6101, 26729, 26731, 20206, 20116, 20073, 20200, and roads and trails around Pineview Reservoir. Roads that change by alternative in Table 4.3.3 are Forest Road numbers 20144, 20221, 20071, 20191, 20070, and 6090.

Table 4.3.3. Sensitive water resources that have high probability of access.

WATER FEATURE NAME	Road/Trail Access Point and Maintenance Status
CURTIS CREEK ANALYSIS AREA	
Headwaters Rock Creek east of Road 060	Forest Road 20060 - Main Arterial Route
Headwaters Curtis Creek near Guard Station	Forest Road 20060 - Main Arterial Route
Sawmill Spring	Forest Road 20060 - Main Arterial Route
Campground Spring on Admin Road	Forest Road 26109 –Admin Road
Chuckhole Spring	Forest Road 20059 - Main Arterial Route
Joanna Spring	Forest Road 20059 - Main Arterial Route
Willow Sink Spring	Forest Road 20028 - Closed Basic Custodial Care
Roundup Spring	Forest Road 20059 - Main Arterial Route
Six Bit Spring	Forest Road 20144-A – Open to high clearance vehicles

Red Wells	Forest Road 20059 - Main Arterial Route
Running Water Spring	Forest Road 20216 - Open
Zion Spring	Forest Road 20221-A – Gated Route
Elmo Pond	Forest Road 20221-A – Gated Route
Blind Spring	Forest Road 20059 - Main Arterial Route
Buck Spring	Forest Road 20197 – Route moved away from spring in ROD
Hayes Spring	Forest Road 26002 – Route closed in ROD
Boundary Spring	Forest Road 26736 – Route moved away from spring in ROD
Tilda Spring	Forest Road 26102 – Not near open route
MONTE CRISTO and WHEATGRASS ANALYSIS AREA	
Sugar Pine	Forest Road 6101 – Open Trail
Peggy Hollow	Forest Road 26729 – Open to high clearance vehicles
Dairy Ridge Reservoir	Forest Road 26731 – Open to high clearance vehicles
Wheeler Spring	Forest Road 20071 – Open to high clearance vehicles
Big Springs	Forest Road 20206 – Open to high clearance vehicles
Dry Bread Pond	Forest Road 20116 - Open to Passenger Cars
Lower Dry Bread Pond	Forest Road 20073 – Open to high clearance vehicles
Bullwacker Spring	Forest Road 20200 – Open to high clearance vehicles, gated
SOUTH FORK ANALYSIS AREA	
South Fork Ogden River	Forest Road 20191 - Open to Passenger Cars
OGDEN FRONT & PINEVIEW ANALYSIS AREA	
Pineview Reservoir	Several roads around reservoir - High Clearance vehicles to Paved user comfortable roads
WILLARD & PUBLIC GROVE ANALYSIS AREA	
Perry Reservoir	Forest Road 20070 – Open to high clearance vehicles
Willard Lake	Forest Road 6090 – Open Trail

An assessment is made of the effects to sensitive water resources from illegal ATV use by alternative. The effect to water resources of current illegal ATV use is the same under all alternatives and is assessed first. The potential effect of illegal ATV use is then assessed by alternative based on the travel routes that would be authorized under each alternative.

Effect of Current Illegal ATV Use on Water Resources – It is assumed that illegal ATV routes have the potential to increase in areas that are conducive to ATV use and routes with high probability of access sensitive water resources are shown in Table 4.3.3. Most of the sensitive water features are very close to roads that are main road arteries through the Forest, main secondary roads, or are administrative roads that are gated from public use. Several of the water features along the main arterial roads are fenced to keep livestock from trampling them. Illegal ATV use has had very little impact on these features as indicated by absence of ATV tracks these features due to fences, road gates, or proximity to higher vehicle use along main travel ways.

4.3.5.2 Effects by Alternative

Effects on Water and Aquatic Resources of Alternatives - It is expected that there is a potential for an increase in illegal ATVs use that could adversely affect aquatic and water resources from rutting and sediment production from ATVs crossing spring areas, wetlands, and perennial streams. Effects are the same between alternatives for Road Numbers 20060, 20059, 20028, 20216, 6101, 26729, 26731, 20206, 20116, 20073, 20200, and roads and trails around Pineview Reservoir and their effects on aquatic and water resources are described in section,

Effect of Current Illegal ATV Use on Water Resources. Effects may occur differently between alternatives for Forest Road numbers 20144, 20221, 20071, 20191, 20070, and 6090. These are presented below.

Table 4.3.4. Summary of Proposed Activities by Alternative.

Road or Area Name	Road No.	Alt 1	Alt 2	Alt 3	Alt 3a	Alt 4	Alt 5
Six Bit spring	20144	New Admin	New Admin	New Admin	New Admin	Open	New Admin
Zion Springs	20221	New Admin	New Admin	New Admin	New Admin	Open	New Admin
Baldy – Wheeler before gates	20071	New Motor tr	Open	Open	Open	Open	Open
Camp Red Cliffe	20191	New Admin	New Admin	New Admin	New Admin	Open	New Admin
Perry Reservoir	20070	Admin	Open	Admin	Admin	Admin	Admin
Willard Lake	6090	Non-motor tr	Motor trail	Non-motor tr	Non-motor tr	Motor trail	Non-motor tr

Alternative 1

Alternative 1 would be the same as current conditions under Alternative 5 except a new motorized trail would be developed on Road 20071 and would not include full sized vehicles use along the road. This would likely reduce illegal full size vehicle use along the Baldy –Wheeler route.

Alternative 2

This alternative would be the same as current conditions under Alternative 5 with the exception of the conversion of a Perry Reservoir route from administrative use to an open status and conversion of the non-motorized Willard Lake trail to a motorized trail. This would increase the amount of motorized use in these two areas and has the potential to result in illegal ATV use, damage to wetland vegetation, and possible sedimentation of water that may impact aquatic organisms in Perry Reservoir and Willard Lake.

Alternative 3

Effects would be the same as Alternative 5.

Alternative 3a

Effects would be the same as Alternative 5.

Alternative 4

This alternative would vary from Alternative 5 by creating open motorized vehicle on Roads 20144, 20221, 20071, 20191, 20070, and convert non-motorized trail on route 6090 to a motorized trail. This would increase the amount of motorized use in these two areas and has the potential to result in illegal ATV use, damage to wetland vegetation, and possible sedimentation of water that may impact aquatic organisms in Six Bit spring, Zion and Elmo springs, along South Fork Ogden River, Perry Reservoir and Willard Lake.

Alternative 5

This alternative is the same as the current travel status on the Ogden Ranger District. Roads numbers 20144, 20221, 20191, and 20070 are managed as administrative use, Baldy – Wheeler Road (20071) is managed as open to all vehicles, and Willard Lake Trail is managed as a non-motorized trail. Currently, there is very little illegal ATV use along these routes although there is the potential for illegal ATV use.

Add the following to section “4.4.3 Effects Analysis Methods and Assumptions” on page 4-11 in the Ogden Travel Plan FEIS.

- Unauthorized routes effects will use the inventory of features digitized from 2010 (9.84 inch) high resolution orthophotography.

Add the following to section “4.4.4 Direct and Indirect Effects” on page 4-13 in the Ogden Travel Plan FEIS.

In conclusion, there is illegal ATVs use that could adversely affect aquatic and water resources from rutting and sediment production from ATVs crossing spring areas, wetlands, and perennial streams. Most of the areas where the potential increase will occur are in upland relatively flat and dry, the adverse effect to water resources are expected to be low. The continued active effort to implement the mitigation measures such as signing, education and information, and obliteration of unauthorized routes will minimize adverse effects to crossing spring areas, wetlands, and perennial streams.

4.4.4.7 Effects of Unauthorized Off-Road Vehicle Use on the Soil Resource

Erosion and sediment occur in all watersheds as a natural geologic phenomenon. Management activities associated with roads, trails, and cross-country motor vehicle use can accelerate erosion and sediment beyond the historic range of variation and geological rate (Satterlund and Adams, 1992). Most of the negative impacts to the soil resource occurs with the creation of the road or trail itself. The presence of a road commits the soil resource to a non-productive use and where roads occupy formerly productive land, they affect site productivity (Gucinski et al., 2001).

The first consequences of pioneering a trail across a landscape are the stripping of surface vegetation, the abrasion of roots, and the compaction of surface soil layers. These impacts destroy soil structure, reduce water infiltration, and break bonds between soil particles. Soil

particles become more vulnerable to displacement and loss from wind or water erosion. Soil compaction can also lead to surface subsidence; the lowering of the trail relative to the adjacent ground surface. Trails then become entrenched. The lower surface intercepts and drains water from adjacent surfaces and channels that flow along the trail. This increases the risk of water erosion on sloped areas and the pooling of water in low-lying sections. As trail surfaces degrade due to rutting, users widen the trail until the area is scarred with a number of routes in various stages of use and abandonment (Meyer, 2002). Once the trail is established impacts continue through processes such as mass wasting, surface erosion, sedimentation, and creation of pioneered routes across the landscape.

When routes are located on soils that have a high potential for erosion or compaction the negative impacts can occur with far less disturbance. Surface erosion occurs when wind or water displaces exposed trail surfaces. This usually occurs on steep terrain or on sandy soils that are susceptible to wind erosion. Surface failure occurs when trail surfaces degrade into muddy tracks with deep muck holes. This usually occurs on flat areas with organic or finely textured soils. Either pathway can lead to environmental impacts that are extremely difficult to stabilize or reverse (Meyer, 2002).

User-created travel routes tend to occur on flatter terrain at the bottom of a draw where they cannot be drained, or perpendicular to the slope where they can quickly rut and become the path of drainage. Properly designed and maintained system roads and trails have cross-drainage features such as rolling dips and water bars to minimize erosion or sediment transport. User-created roads and trails do not have these features and over time erosion increases. Generally, user-created routes have the most potential to impact the watershed processes, water quality, and riparian health.

Table 4.4.1: Miles by Alternative

Alternative	High Risk Area (miles)
Alt 1	18
Alt 2	24
Alt 3	11
Alt 3a	14
Alt 4	126
Alt 5	14

Effects of Alternatives - It is expected that there would be a potential for an increase in unauthorized routes that could adversely affect soil resources especially in areas where new routes or change in designation have been proposed from the existing designation. Miles by alternative are listed in Table 4.4.1 for new, open route designations in high risk areas (as outlined under Analysis and Comment). Alternative 4 (existing condition) was used as the baseline for changes in route designations. Within Alternative 4 the designations of old closed, n/a, non-motor trail, non-existent, and unclassified were used in the GIS analysis to determine route changes by alternative. Changes in designation included new open, new road, and new motorized trail. Potential miles conducive to creation of new unauthorized routes are outlined in Table 4.4.1. Whether additional impacts to the soil resource are likely is stated in Table 4.4.2. The "Potential" classification for additional impacts is based on at least one Action Alternative

that changed the designation from the existing condition. Action alternatives are outlined in the FEIS.

Table 4.4.2. Additional Impacts

Curtis Creek Analysis Area Road or Area Name	Road No.	Illegal routes currently exist near travel route	Topography conducive to unauthorized trail creation	Additional impacts to soil resource likely from new unauthorized trail creation	Comment
Tilda Spring 1	26001	Yes	Yes	No	Not open to motorized travel
Tilda Spring 2	26002	Yes	Yes	No	Not open to motorized travel
Tilda Spring 3 extension	xxx4	Yes	Yes	Potential	0.7 mile segment of motorized trail open
Tilda Spring 4	26004	Yes	No	No	Not open to motorized travel
Tilda Spring overlook	26102	Yes	Yes	Potential	3.69 miles of open motorized trail
Boundary Spring ATV	26736	Yes	Yes	Potential	0.15 mile segment re-rte to protect spring. ~1 mile section reclaimed.
Boundary Spring reroute	xxx5	Yes	Yes	No	0.15 mile segment re-route to protect spring. ~1 mile section reclaimed.
Baxter Sawmill 2	26994	Yes	Yes	Potential	1.1 miles – Potential new open road
Baxter Ridge	26714	Yes	Yes	Potential	0.9 miles –Potential to be managed as new road
Davenport Hollow overlook	xxx8	Yes	Yes	No	1.12 miles – closed to motor but will be managed as non-motor
Davenport Hollow south	20196	No	Yes	Potential	1.1 miles managed as new where connects to tilde Spring 3 (xxx4)
Davenport Hollow north	20196	Yes	Yes	Potential	--
Arbs Basin	20269	Yes	Yes	Potential	--
Arbs dispersed camping	20057	Yes	Yes	Potential	To access dispersed site. Ends in area outside of risk analysis area.
Arbs Private	26724	Yes	Yes	Potential	--
Walton Gulch	xxx7	No	No	Potential	New
Tin Cup Spring	20210	Yes	Yes	Potential	--
Buck Spring reroute	20197	No	Yes	No	0.25 miles – realigned ~1.9 miles gated
Middle Davenport	20187	Yes	Yes	Potential	--
North Gorge Canyon	xxx3	No	No	Potential	New
Curtis private	20074	Yes	Yes	Potential	0.5 miles – cont as admin
Dry Gulch dispersed	xxx2	Yes	Yes	Potential	--
Six Bit Spring	20144	Yes	Yes	No	2.2 miles – gated admin use

Zion Spring	20221	Yes	Yes	No	0.2 miles – access to dispersed camp. 1.9 miles – gated admin use
Running Water Ridge ATV	xxx9	Yes	Yes	Potential	New
Laketown Spur 1	26717	No	No	No	Closed
Laketown Spur 2	26718	No	No	No	Closed
Spencer Basin gated	20103	Yes	Yes	Potential	Level 1 currently- bring up to Level 3 to create loop
Red spur electronic	20205	No	No	No	--
Campground Springs	20082	No	Yes	Potential	Open to use. Ends at dispersed campsite.
Curtis Ridge Tr	3309	Yes	No	Potential	New ATV trail. Existing trail?
Six Bit-Spencer ATV	xx10	No	No	Potential	New trail. Creates loop.
Big Crawford Creek 1	26704	Yes	Yes	No	1.36 miles (combined 1,2,3) – close and reclaim
Big Crawford Creek 2	26705	No	Yes	No	1.36 miles (combined 1,2,3) – close and reclaim
Big Crawford Creek 3	26706	No	Yes	No	1.36 miles (combined 1,2,3) – close and reclaim
Crawford Creek 1	26989	No	Yes	No	0.9 miles – to be reclaimed
Otter Creek private (0.45 mile)	xx36	Yes	Yes	Potential	0.45 miles - signed closed and managed for admin use
Nick Reservoir (0.9 mile)	26979	Yes	Yes	No	Managed for admin use. South end ripped and seeded.
Longhurst Spring	26980	Yes	No	No	2.7 miles – gate installed and managed for admin use
Dry Canyon	26983	Yes	Yes	No	0.5 miles – gated
Pole Hollow	26109	Yes	Yes	Potential	1.4 miles – admin use don't know if gated
Valley Ridge north	xxx1	Yes	Yes	No	Low erosion hazard. Not new construction
Dry Fork	20162	Yes	No	No	2.1 miles – closed and reclaimed
Bob Kiddys Hole	26707	No	No	No	--

Monte Cristo and Wheatgrass Analysis Area Road or Area Name	Road No.	Illegal routes currently exist near travel route	Topography conducive to unauthorized trail creation	Additional impacts to soil resource likely from new unauthorized trail creation	Comment
Dry Bread Upper	20107	Yes	No	Potential	--
Dry Bread Hollow ATV	6324b	No	No	No	--
Dry Mitchell ATV	xx13	Yes	Yes	Potential	--
Dry Bread Loop	xx11	Yes	No	Potential	New

Eli Ridge (beginning)	20202	Yes	Yes	Potential	--
Eli Ridge(end)	20202	Yes	Yes	Potential	--
Powerline Spur	26711	No	Yes	Potential	Provide access to dispersed camp
Silvia Overlook	26712	Yes	Yes	Potential	--
Monte Cristo Pit Overlook	20112	Yes	Yes	Potential	--
Powerline overlook	26019	Yes	Yes	Potential	--
Dairy Wash ATV	xx14	No	No	No	--
Harriet Spring 1	xx35	No	No	Potential	--
Harriet Spring 2	xx37	Yes	No	Potential	Provide access to dispersed camp
Harriet Spring 3	xx38	No	No	Potential	Provide access to dispersed camp
Blake Hollow	20198	Yes	Yes	Potential	--
Wasatch Dispersed Rec.	26733	Yes	No	Potential	Provide access to dispersed camp
Blue Bell Flat – south end	20201	No	No	No	--
Neponset cutoff	xx12	Yes	Yes	Potential	--
Middle Ridge power line trail	6317	No	Yes	Potential	Potential change from admin use to public use
Silvia Hollow trail	6314	No	Yes	Potential	Potential change in status
Neponset spring trail	6315	Yes	Yes	Potential	--
Wasatch hunting camp	20222	No	Yes	Potential	Potential change from admin use to public use
Baldy – Wheeler before gates	20071	No	No	No	--
Baldy – Wheeler behind gates	20071	Yes	Yes	Potential	--
Baldy Ridge	26708	No	No	No	--
Dairy 2	26732	No	No	No	--

South Fork Analysis Area Road or Area Name	Road No.	Illegal routes currently exist near travel route	Topography conducive to unauthorized trail creation	Additional impacts to soil resource likely from new unauthorized trail creation	Comment
Camp Red Cliffe	20191	Yes	Yes	No	1.13 miles – gated. For admin use.

Ogden Front and Pineview Analysis Area Road or Area Name	Road No.	Illegal routes currently exist near travel route	Topography conducive to unauthorized trail creation	Additional impacts to soil resource likely from new unauthorized trail creation	Comment
Skyline Divide north	6001	Yes	No	Potential	10.5 miles – seasonally closed – signed only
Skyline Divide south	6001	Yes	No	Potential	8.5 miles – single track No seasonal closure potential
Lewis Peak trail	6041	No	No	No	--
Coldwater Peak trail	6087	No	No	No	--
City View tr (Skyline to Lewis)	6040	No	No	No	--

Willard and Public Grove Analysis Area Road or Area Name	Road No.	Illegal routes currently exist near travel route	Topography conducive to unauthorized trail creation	Additional impacts to soil resource likely from new unauthorized trail creation	Comment
West Fork Willard Canyon	6323	Yes	Yes	Potential	Closed 2012
Box Elder Creek ATV trail	xx34	Yes	Yes	Potential	1.24 miles – new
Perry Reservoir	20070	Yes	Yes	Potential	Admin closed 2012
Grizzly Peak 4X4	20091	Yes	Yes	Potential	--
Willard Mountain	20084	Yes	No	No	11.8 miles – seasonal closure
Inspiration Point	6091	No	No	No	0.4 miles - new designation
Willard Lake	6090	Yes	Yes	Potential	0.8 miles – closed but new non-motor
Dock Flat to Perry Reservoir	26010	Yes	No	No	4.4 miles – new
Dock Flat Loop east of 20084	26010	Yes	Yes	Potential	4.4 miles – new
Dock Flat parking west of 20084	26010	Yes	Yes	Potential	4.4 miles – new
Pete's Hollow trail	26022	Yes	No	Potential	--
Upper Dock Flat	xx29	Yes	Yes	Potential	0.23 miles – new designation
Devils Hole canyon ATV	xx30	No	No	Potential	1.8 miles – new
Mantua church camp	xx31	Yes	Yes	No	0.8 miles – new designation. Seasonal closure
Clay Valley	26011	No	Yes	Potential	Potential change to open status
Sink Hole Loop	26012	Yes	Yes	Potential if on FS	0.84 miles - Court action
Public grove 4X4 – west 15	20220	Yes	Yes	Potential	4.5 miles – new designation

Public grove 4X4 – east 15	20220	No	Yes	Potential	4.5 miles – new designation
Avon gravel 1	26743	No	No	No	--
Dip Hollow ATV	xx33	No	No	Potential	Not open to motorized travel- connects 27743 and 20220
Public Hollow loop 4X4 -north	20092	No	Yes	Potential	Seasonal closure
Public Hollow loop 4X4 -south	20092	No	Yes	Potential	Seasonal closure
Jensen ranch 4X4	20114	Yes	Yes	No	0.41 miles – gated and managed for admin use
Jensen spur	26018	Yes	Yes	Potential	--
Little Bear ATV	xx32	No	No	Potential	New
Note: Topography conducive to ATV trail creation is 1) slopes less than 30% and 2) canopy cover is <50%. Note: If illegal routes exist and topography columns are No: additional impacts are assumed no. If illegal routes exist and topography columns are Yes: additional impacts are assumed Potential.					

Add the following to section “4.5.3 Effects Analysis Methods and Assumptions” on page 4-14 in the Ogden Travel Plan FEIS.

- Unauthorized routes effects will use the inventory of features digitized from 2010 (9.84 inch) high resolution orthophotography.

Add the following to section “4.5.4 Direct and Indirect Effects” on page 4-14 in the Ogden Travel Plan FEIS.

4.5.4.7 Effects of Unauthorized Off-Road Vehicle Use on Vegetation

Analysis of potential habitat of USFWS R4 Sensitive Species and one Federally listed species in regard to areas that are deemed to be of high risk for illegal OHV use.

The Endangered Species Act, the Forest Service Manual and Forest Plan require that plants that are recognized by the USFWS, Forest Service and the State of Utah have special consideration when projects are planned (USDA, FS. 2013). The following plants have been documented on the Ogden Ranger District (UNHP2003, Welsh, et.al. 1993). The following table lists sensitive plant species that are known on, or have potential habitat on the Ogden Ranger District.

Table 4.5.3 TES plants with known populations or potential habitat on the Ogden Ranger District.

Scientific Name	Common Name	MidscaleVegType	Elevation (Feet)
Federally Listed			
<i>Spiranthes diluvialis</i> (Threatened)	Ute Ladies's tresses	WM,WI,WA	< 7,000
Forest Service Sensitive			
<i>Angelica wheeleri</i>	Wheelers Angelica	BH, WM,WI,WA	6,200-10,000
<i>Corydalis caseana</i> spp. <i>brachycarpa</i>	Wasatch fitweed	SF, WM,WI,WA	6,200-10,000
<i>Cypripedium fasciculatum</i>	Brownie lady's slipper	SF,DF,LP	8,000-9,600
<i>Draba burkei</i>	Burkes draba	DF, QS, SG	8,400-9,700
<i>Draba maguirei</i>	Maguire's draba	DF, QS, SG	8,400-9,700
<i>Eriogonum loganum</i>	Logan buckwheat	PJ	4,790-9,000
<i>Ivesia utahensis</i>	Utah ivesia	BA	6,200-10,000
<i>Penstemon compactus</i>	Cache beardtongue	MM	5,938-11,712
<i>Tonestus kingii</i> var. <i>Barnybani</i> **(<i>Aster kingii</i>)	Wood Aster	BN	6,000-10,000

Table 4.5.3. The Midscale Veg types are as follows: SF Spruce fir, DF Douglas Fir, QS Gamble Oak, TF Tall Forb, BA Barren, SG Sage Grass, LP Lodgepole pine, PJ Pinyon juniper, MM Bigtooth Maple, WM Wet Meadow, WI Willow, WA Water.

Rare plants, by virtue, are not well published unless work has been done to conserve populations and/or the species. Habitat descriptions for R-4 Sensitive species was obtained from personal observations and several other sources;

- Welsh, S.L., N.D. Atwood, S. Goodrich and L.C. Higgins. 1993. A Utah Flora (2nd ed., revised). Brigham Young University. Provo, Utah.
- USDA, NRCS. The PLANTS database (<http://plants.usda.gov/plants>). National Plant Data Center, Baton Rouge, LA 70874-4490 USA.
- Utah Natural Heritage Program. 2013. Element Occurrence Database. Utah Division of Wildlife Resources. Salt Lake City, Utah.

Based on the above information the Midscale Vegetation types were chosen for each species to gain an understanding of rough potential habitat.

GIS assumptions:

Polygons of "High Risk areas of Illegal ATV Use" were developed using the following criteria based on previous use and knowledge where past unauthorized use has been recorded:

Vegetation - using our existing coarse vegetation cover layer areas less than 30% cover are more prone to unauthorized use.

Topography - More unauthorized routes would be expected to be created off of existing routes through flatter terrain than off existing routes on steep terrain. As a general measure, existing routes on terrain 30 percent or less would be expected to have more unauthorized routes than existing routes on terrain steeper than 30 percent.

Models were created overlapping the TES Midscale Veg types and High Risk Areas of Illegal ATV Use to obtain a rough estimate of acres of potential habitat that might be impacted by illegal OHV routes.

It is important to note that the Midscale Vegetation types are general and broad scale. Rare plants typically enjoy a specific niche within those vegetation types. It would be difficult to model precise habitat types for rare plants because, by virtue of being rare, there is not a lot known about their life history characteristics. A first level coarse filter to search for rare plants is to look at a particular habitat or vegetation type that it has historically been found in. They often inhabit niches within vegetation types that are too fine in scale to be able to map. The following table is not intended to outline specific acres of potential habitat for any given rare plant but to outline the amount of habitat, within which the niches where rare plants have been historically found.

Table 4.5.4 Acres of potential TES plant species habitat within High Risk Areas for Illegal ATV Use.

Scientific Name	Common Name	Acres of TES habitat in High Risk Areas for Illegal ATV Use
Federally Listed		
<i>Spiranthes diluvialis</i> (Threatened)	Ute Ladies's tresses	9.06
Forest Service Sensitive		
<i>Angelica wheeleri</i>	Wheeler's Angelica	0.17
<i>Corydalis caseana</i> spp. <i>brachycarpa</i>	Wasatch fitweed	2,953
<i>Cypripedium fasciculatum</i>	Brownie lady's slipper	3,680
<i>Draba burkei</i>	Burke's draba	2,054
<i>Draba maguirei</i>	Maguire's draba	2,054
<i>Eriogonum loganum</i>	Logan buckwheat	373
<i>Ivesia utahensis</i>	Utah ivesia	21
<i>Penstemon compactus</i>	Cache beardtongue	11
<i>Tonestus kingii</i> var. <i>Barneybiani</i> **(<i>Aster kingii</i>)	Wood Aster	21

These plants can be negatively affected by a variety of activities, human and non-human. Human activities include impacts associated with illegal Off Highway Vehicle (OHV) use, hiking, camping, picnicking and other activities that cause people to congregate in unique areas for long durations. Animal activities, both domestic and wild, may impact populations by herbivory and/or trampling.

The Willard area, especially from Inspiration Point south to Ben Lomond is of concern. Our highest concentration of rare plants is in this area. There are two major concerns regarding the plants in this area, illegal OHV use and an increasing Mountain Goat population. Foot traffic use

of the area might also be considered a concern for rare plants, but probably to a lesser extent.

These impacts are true across all alternatives. Through travel management, enforcement and regular patrols, illegal OHV routes can be discovered and shut down prior to them becoming a major impact to any TES plant species.

In conclusion, illegal ATVs use could adversely affect vegetation and TES Plant habitat primarily by removing the vegetation itself and secondarily by erosion. The continued active effort to implement the mitigation measures such as signing, education and information, and obliteration of unauthorized routes will minimize adverse effects to rare plant habitat.

Noxious Weeds

Noxious weeds are generally designated as such because they have significant negative effects (or potential) on agriculture, economics, or ecosystems, and are usually not so abundant that eradication is infeasible. Noxious designation has legal ramifications for interstate transport, nursery stock inspections, and seed certifications (USDA 2004).

The number of infestations in relation to the acres infested illustrate that we have numerous small infestations that are spread out across the district.

Table 4.5.5. Noxious weeds that have established populations on the Ogden Ranger District.

NRCS Plant Code	Scientific Name	Common Name	Number of Infestations	Infested Acres
AECY	<i>Aegilops cylindrica</i>	jointed goatgrass	9	8.5
ARM12	<i>Arctium minus</i>	lesser burdock	297	303
CADR	<i>Cardaria draba</i>	whitetop	19	1.5
CANU4	<i>Carduus nutans</i>	nodding plumeless thistle	70	27
CEBI2	<i>Centaurea biebersteinii</i>	Spotted knapweed	14	2.6
CEDI3	<i>Centaurea diffusa</i>	diffuse knapweed	1	0.04
CESO3	<i>Centaurea solstitialis</i>	yellow star-thistle	7	2
CIAR4	<i>Cirsium arvense</i>	Canada thistle	414	411
CIVU	<i>Cirsium vulgare</i>	bull thistle	45	98
COAR4	<i>Convolvulus arvensis</i>	field bindweed	125	111
COMA2	<i>Conium maculatum</i>	poison hemlock	11	0.5
CYOF	<i>Cynoglossum officinale</i>	gypsyflower	488	413
ELAN	<i>Elaeagnus angustifolia</i>	Russian olive	10	49
ELRE4	<i>Elymus repens</i>	quackgrass	12	37.3
EUES	<i>Euphorbia esula</i>	leafy spurge	35	36
EUMY2	<i>Euphorbia myrsinites</i>	myrtle spurge	6	2
HYNI	<i>Hyoscyamus niger</i>	black henbane	1	0.01
HYPE	<i>Hypericum perforatum</i>	common St. Johnswort	2	0.62
ISTI	<i>Isatis tinctoria</i>	Dyer's woad	664	1058
LELA2	<i>Lepidium latifolium</i>	broadleaved pepperweed	2	0.05

LEVU	<i>Leucanthemum vulgare</i>	oxeye daisy	12	6.31
LIDA	<i>Linaria dalmatica</i>	Dalmatian toadflax	86	50
ONAC	<i>Onopordum acanthium</i>	Scotch cottonthistle	8	0.15
PORE5	<i>Potentilla recta</i>	sulphur cinquefoil	34	12
TARA	<i>Tamarix ramosissima</i>	saltcedar	2	0.55
THAR5	<i>Thlaspi arvense</i>	field pennycress	1	0.19
TRTE	<i>Tribulus terrestris</i>	puncturevine	7	0.7
VEVI2	<i>Verbascum virgatum</i>	wand mullein	2	0.02
Total			2384	2631.04

The above listed weeds are primarily rangeland weeds, meaning that barring full shade and full submersion in water, they will grow anywhere. The transportation of weed seeds along travel routes has the potential to increase the spread of or introduce new noxious weed populations. Transport by wind, on vehicles, clothing or animals are all mechanisms for noxious weed dispersal into new habitats. For this reason noxious weed invasions due to recreational activities and permitted uses are a primary concern of managers.

Invasive species rank #1 on a parallel priority level with Homeland Security (Per Forest Service Chief Dale Bosworth) and is in the top 4 priorities of the USFS because of their impacts and threat to our mission (USDA 2003a). Emphasis on noxious weeds has increased significantly in recent years, as more people recognize invasive species' effect on all other resource areas. In addition to the national emphasis, locally the Wasatch-Cache National Forest Revised Forest Plan (USDA 2003b) provides increased direction on noxious weed management (USDA 2004). Furthermore an Integrated Weed Management Strategy was developed on the Wasatch Cache National Forest in 2005 and a Weed Treatment EIS was completed in 2006. These documents outline the weed treatment program on the district and are intended to deal with current and potential weed infestations.

These impacts are true across all alternatives. Through travel management, enforcement and regular patrols, illegal OHV routes can be discovered and shut down prior to them becoming major vectors for noxious weed expansion.

In conclusion, illegal ATVs use could adversely affect vegetation by creating potential habitat that favors noxious weeds by directly removing the native vegetation and also act as vectors for noxious weed seed transport. The continued effort in noxious weed control and the active effort to implement the mitigation measures such as signing, education and information, and obliteration of unauthorized routes will minimize adverse effects to the ecosystem.

Add the following to section “4.6.7 Effects Analysis Assumptions” on page 4-17 in the Ogden Travel Plan FEIS.

- Unauthorized routes effects will use the inventory of features digitized from 2010 (9.84 inch) high resolution orthophotography.

Add the following to section “4.6.3 Direct and Indirect Effects” on page 4-41 in the Ogden Travel Plan FEIS.

4.6.3.7 Effects of Unauthorized Off-Road Vehicle Use on Wildlife

The purpose of the wildlife section of this supplemental is to evaluate and disclose the effects of existing and potential unauthorized routes on wildlife by alternative. There are primarily two facets to analyzing these effects by alternative. First, what are the effects of currently existing unauthorized routes on wildlife? And, second where are new routes likely to occur that would likely have additional effects to wildlife by alternative?

Analyzing the effects of existing unauthorized routes on wildlife is difficult because knowledge of unauthorized routes are incomplete, new routes are regularly created and existing routes are constantly being closed. Furthermore, the effectiveness of closures varies which depends on location, topography, vegetation, and type of closure. Some unauthorized routes are more difficult to close because they originate from private property and have no access from public roads. Finally the enforcement of closures varies because of differences in enforceability wherein routes farther into the back country are visited less frequently by law enforcement than unauthorized routes closer to populated areas. Given these limitations, we used the best information available about our existing unauthorized routes to evaluate effects to wildlife.

The use of unauthorized routes varies from route to route and from area to area, where some are used more than others. For example those that originate from private property have different use than those originating from authorized routes. Likewise, those originating in back country areas are used differently than those originating from front country areas. Finally, Routes originating off of authorized roads and motorized trails are used differently than those originating from another unauthorized route.

Evaluation of areas prone to the creation of new unauthorized routes is also problematic because it is difficult to determine where new routes will occur. Our approach is to essentially evaluate the proximity of the route alternatives to areas that may be prone to new route creation and then to determine if these areas fall within important habitats. We assumed that prone areas closer to authorized roads and motorized trails would have a higher probability of having a new route develop than an area isolated from authorized roads and trails. To determine where new routes would be likely, we assumed that flatter areas (less than 30% slope) and areas where vegetation was more sparse (shrub, forb and grasslands, and tree canopy cover less than 50%), would be more likely to have new routes develop than areas with thicker vegetation and steeper slopes. We verified our predictions by overlaying known unauthorized route data over areas predicted to be prone to new route creation. We found that the majority of unauthorized routes fall within areas predicted to be prone to newly created unauthorized routes. Likewise, most of our current authorized roads also fall within these areas.

The amount of unauthorized routes does not vary by alternative. However, the use of these routes probably varies and is related to their proximity to authorized routes. We note that the known unauthorized route data is not complete. The data was created by remote sensing of aerial photography on a Geographic Information System which created the Unauthorized Travel

Features (UFF) data layer. This UFF layer could then be overlaid over other spatial data and evaluated. We conducted on the ground surveys of a subset of these features to determine their accuracy in identifying unauthorized routes. Data collected in the surveys included whether these were actually routes, evaluated status (closed or not), the degree of use, and other variables.

Some routes included on that layer were not actually unauthorized routes (ex. Fence lines, animal trails), some were routes but were effectively closed, and some pieces of these routes were not detected by the GIS system because the on the ground feature was hidden by tree Canopy. However, this data is the best estimate of unauthorized routes that we have.

GIS was used to analyze the effects to wildlife to determine the miles of unauthorized routes by habitat types. The table below shows the approximate miles of road within each course habitat type found within the WCN vegetation data layer. These vegetation types are general types that roughly estimate the type of vegetation present in various locations on the forest. The miles of unauthorized routes within each forest type is not exact because of two reasons:

1. The line segments of the unauthorized route data sometimes fall within more than one vegetation type. This caused the GIS system to sometimes make small errors in the length of each segment that falls within each type.
2. The vegetation layer is only accurate as course habitat types and has poor resolution. There exists on the ground, instances where small patches of other types occur within the vegetation type polygons.

Two habitat types were not included because they have little effect on wildlife, water, and agricultural. The segment classified as water fell within the shoreline of Pineview reservoir, and the areas classified as agriculture occurred on private property and were therefore omitted in the table below. Neither of these segments would impact wildlife on the forest. Nevertheless this is the best estimate of the miles of routes within each type.

Table 4.6.12 Miles of Unauthorized routes by habitat type.

Habitat Type	Miles
Tall Shrub/Mountain Brush	16.8
Tall Forb	0.69
Spruce-Fir	22.63
Aspen	31.57
Aspen-Conifer	8.8
Conifer Aspen	10.24
Douglas Fir	16.27
Sage brush/grassland	72.4
Pinion-Juniper or Juniper	4.1
Gamble's Oak	7.53
Lodgepole Pine	19.28
Mahogany	0.3
Mixed Conifer	10.29

Based on the assumption that new motorized routes will open access to the inventoried Unauthorized Travel Features (UUF), a review of routes that intersect a new road, new motor trail, or a new open road was completed. The following table shows the number of UUF segments and the total sum of the miles of those UUF routes by alternative. The table below reflects the number of miles of unauthorized line features that would be accessible by alternative. Variation occurs because routes proposed by each alternative would provide more or less access to existing known unauthorized routes due to proximity.

Table 4.6.13 Number and miles of unauthorized routes that would be within access distance by alternative. Variation in the miles is due to differences in proximity to authorized routes by alternative

Alternative	Segment Count	Miles
Alternative 1	52	8.31
Alternative 2	83	11.54
Alternative 3	43	5.75
Alternative 3a	47	5.74
Alternative 4	0	0
Alternative 5	58	7.48

The comparison of miles by alternative is consistent with the theme of each alternative. More new routes were proposed on alternatives emphasizing human activities and fewer routes were proposed in areas with protected resources (wildlife, road less areas). Routes not authorized under the alternatives would be posted closed upon discovery and would receive physical barrier installation when possible and when funding was available.

Here I disclose the direct and indirect effects to wildlife from unauthorized routes and where appropriate, discuss potential for effects from areas where new routes may be more likely, especially where these areas intersect sensitive wildlife areas.

Measurement indicators used to evaluate effects of unauthorized routes on wildlife habitat are:

- Miles of unauthorized routes within key habitats.
- Acres of disturbed land within select species quality habitat.
- Road density, including authorized motorized and unauthorized routes.
- Changes to patch size for select species habitat due to both unauthorized and authorized routes.

Not all of these indicators are relevant to all species because of scale, behavior or other factors. For example, patch size is important to elk, which exhibit avoidance behavior away from roads, but may not be important to small mammals because of the scale of habitat used is much smaller than elk. Therefore the effects of reduced patch size are much greater on elk than on small mammals. In the analysis below, I evaluate the above indicators where applicable by species relative to unauthorized routes.

Motorized activities and routes disrupt the connectivity of the regional wildlife corridor described in the Forest Plan. Measurement indicators used to compare alternatives related to the regional wildlife (lynx, wolverine, grey wolf) corridor are:

- Miles of roads and motorized trails within Curtis Creek, Monte Cristo and Causey areas.
- Road density, including motorized trail density in the same areas.

The analysis will focus on species determined to be affected by authorized routes from the preferred alternative from the original Ogden Travel Plan EIS. The miles of unauthorized routes for each species should be considered to be additional to the preferred alternative (See original EIS for miles of authorized motorized routes). The analysis will consider Management Indicator Species (MIS), Regional Forester's Sensitive Species, Species Federally listed under the Endangered Species Act, and species of economic value or those that are of high interest to the public. The table below shows species considered in the Ogden Travel Plan EIS and the determination of effects from the preferred alternative. In this supplemental, we will only consider those species that were determined in the original EIS to experience effects under the preferred alternative. Additional effects from unauthorized routes and potential effect from routes that may develop in the future will be evaluated for each of the considered species.

Table 4.6.14 Determinations of effect of the preferred alternative in the original FEIS. Species where effects were expected from the preferred alternative will be evaluated further in regard to unauthorized routes.

Species	Determination on preferred alternative	Considered
Mule Deer	Moderate to high effects depending on alternative	Yes
Elk	moderate effects	Yes
Mountain Goats	Effects mitigated through seasonal closures	Yes
Moose	No substantial change in population with any of the alternatives	No
Small Mammals	Not significant	No
Wolves	effects to the wolf will be related to the effects on their prey species such as deer and elk and from road densities	Yes
Goshawk	Moderate effects on goshawk and their habitat compared to the other alternatives.	Yes
Snowshoe Hare	There is no significant difference between alternatives on snowshoe hare habitat or their populations.	no
Beaver	Effects of the alternatives will not influence the trend in beavers. No substantial change in beaver population numbers is expected with implementation of any of the alternatives.	No
Lynx	moderate compared to all alternatives	Yes
Bald Eagle	No significant changes from the existing condition. All alternatives will have the same effect. Existing activities may affect individuals, but is not likely to adversely affect the bald eagle population.	no
Black Footed Ferret	Species will not be affected by any of the alternatives.	No
Yellow-billed Cuckoo	There are no significant changes from the existing condition. All alternatives will have the same affect to Yellow-billed Cuckoos and their habitat.	No
Ogden Rocky Mountain Snail	species will not be affected by any of the alternatives	No

Peregrine Falcon	None of the alternatives will affect existing peregrine falcon nesting sites. Preferred alternative may reduce motorized effects to potential habitat for the peregrine falcon	No
Boreal Owl	The effects of any of the alternatives will be negligible on boreal owl habitat or populations.	No
Great Grey Owl	The effects of any of the alternatives will be negligible	No
Wolverine	Preferred alternative would have a moderate effect on wolverine and their habitat as compared to other alternatives.	Yes
Townsend's Big-Eared Bats	The effects to foraging habitat would be minor. It is unlikely any of the alternatives would influence bat numbers.	No
Flammulated Owls	disturbance may reduce reproductive success in the Box Elder Creek motorized trail area but will not eliminate use	Yes
Three-toed woodpeckers	Will not likely be affected by implementation of any of the alternatives.	No
Sharp-tailed Grouse	Preferred alternative would have the least effect during the strutting period for sharp-tailed grouse.	Yes
Greater Sage Grouse	Implementation of the seasonal closures, this alternative is comparable to alternatives 1, 3, and 4, with fewer effects.	Yes
Pygmy rabbit	species will not be affected by any of the alternatives	No
Brewer's Sparrow	Moderate effects on Brewer's sparrows and their habitat as compared to other alternatives.	Yes
Broad-tailed Humming bird	The effects to foraging habitat, mainly in riparian habitat areas, will be minor and not be significant. The effects of any of the alternatives will not likely influence Broad-tailed Hummingbird numbers.	No
Virginia's Warbler	Road construction and trail and off-road vehicle use as likely detrimental effects to Virginia's warbler, although the effects have not been studied.	Yes
Gray catbird	This species is not likely to be affected by any of the alternatives.	No
Williamson's Sapsucker	This species is not likely to be affected by any of the alternatives.	No
black -throated gray Warbler	Alternatives with fewer miles of road and motorized trail within the juniper vegetation type will likely have less effect to the black-throated gray warbler.	Yes
Fringed myotis	The effects to foraging habitat for bat species, mainly in riparian habitat areas, would be minor. Similar to effects to the Townsend's big-eared bat, it is unlikely any of the alternatives would affect fringed myotis numbers.	No
American Marten	The alternatives with fewer miles of road and motorized trail within the conifer vegetation types may have less effect on marten habitat, especially within the Curtis analysis area	Yes

Add the following to section “4.3.3.1 Effects on General Wildlife” on page 4-18 in the Ogden Travel Plan FEIS.

Mule Deer

All unauthorized routes occur within deer habitat of some type, the most important of which occurs with mule deer critical and high value winter habitats. These winter habitats are important because they are the limiting factor for mule deer populations in Northern Utah, and because when deer use these habitats they may be low on fat reserves needed for survival. Therefore a flight response in late winter due to a vehicle uses needed energy reserves. However, the effects of roads and motorized trails within key winter range habitat are limited, since weather conditions usually preclude use by motorized vehicles. The tables below show the miles of unauthorized routes by winter habitat type and by analysis area.

Table 4.6.15 The miles of unauthorized routes in high and crucial value deer winter habitat.

Mule Deer habitat Type	Miles
Winter, High	8.4
Winter, Crucial	2.8
Total	11.2

Table 4.2.16 The miles of unauthorized routes in crucial winter habitats by analysis areas.

Analysis Area	Miles
Ogden Front	0.49
South Fork	0.13
Willard	1.9
Monte Cristo	0
Curtis	0.324
Total	2.844

Table 4.6.17 The miles of unauthorized routes in high value winter habitat for deer.

Analysis Area	Miles
South Fork	0
Ogden	0.12
Willard	6.71
Monte Cristo	0
Curtis	1.6
Total	8.43

Summer habitat is not as important to deer survival because it is more abundant and available during the time of year where food resources are abundant. Wisdom, et al (2004) found that recreational activities have little difference in the measurable response during ATV, mountain biking, horse riding, and hiking activities. They determined that 6% to 11% of deer responded in a flight response within 100 meters of ATV, mountain bike, horse, or hiking activity. They note that deer may respond differently to disturbance than elk, by seeking dense vegetative cover

rather than actually running from the disturbance activity. If mule deer spend more time in dense cover in reaction to a disturbance activity, it could reduce foraging activity, thus affecting the ability of the animal to put on fat reserves needed for winter survival. Given the use of most of these unauthorized routes, this type of effect is unlikely to cause this type of affect.

There are approximately 87 miles of unauthorized routes in mule deer summer habitats. Deer numbers on the Ogden Ranger District are controlled by the amount and quality of winter habitat. Effects from unauthorized routes in summer habitat are minor.

There are approximately 28,934 acres of deer habitat that may be prone to the creation of new routes across the Ogden Ranger District, the majority of which fall within deer summer habitat. Not all of these prone areas will develop new routes because, often, newly created routes are pushed to get to landscape features such as ridgelines (or other viewpoints) or water sources. Efforts will continue, as always, to close unauthorized routes.

Acreage of areas that may be prone to new unauthorized routes in deer winter habitat is approximately 5362 acres. Most of these acres occur in the Willard and South fork analysis areas. Only the Willard area has routes within the prone areas which totals approximately 3298 acres and occurs mostly within the public grove areas where seasonal restrictions are in place. Seasonal closures prevent effects in these areas.

Alternatives designed to allow more human use would have greater effects than alternatives that favor wildlife or Roadless areas. When more authorized routes are available, the number of unauthorized routes available to visitors also increases. We found through our surveys that use of unauthorized routes varies and in general these routes are used less than authorized routes. Furthermore, more than half (60%) of these routes are effectively closed by single point closures. Forest Service staff has attempted to close most access points originating from authorized routes, even though the effectiveness of these closures vary. Because of these factors, effects to deer from unauthorized routes are less than what occurs from authorized routes. Unauthorized routes that originate from private property, and do not connect to authorized routes, do not tend to receive closure efforts. Nevertheless these routes do not receive as much use either.

Times of the year when unauthorized routes likely receive the most use, and thus have the most effect, is during hunting season when people are seeking out big game. In these cases, the duration of intense use of these routes lasts for a few weeks during the rifle deer and elk hunts, and mostly on the weekends. During these times the effects from unauthorized routes are more intense but are short lived. Because hunters are mostly pursuing males, the effects to male mule deer are high. However this male mortality is compensatory (i.e. harvesting excess animals) and population growth is unaffected because enough males survive to be able to adequately fertilize females for next year's fawns. The effects of the use of unauthorized routes on females are relatively minor during these times because they are temporarily displaced into other available habitats.

The main effects of unauthorized routes occur when these routes are located within winter habitats. However use of these routes during the winter is uncommon because deep snow and seasonal closures prevent the majority of use during the winter. The effects from these routes are

therefore slight to moderate on mule deer under the preferred alternative (alternative 5) and are moderate compared to other alternatives.

Elk

Elk are sensitive to the presence of motorized vehicles, and exhibit avoidance of used roads by up to 1000 m. However, they will use closed roads as travel corridors if they are not used by motorized vehicles. Therefore the effects of unauthorized routes depend heavily on the amount of use they receive. The miles of known unauthorized routes within the Ogden Ranger District are shown in the tables below. These are broken out into their seasonal importance to elk.

Table 4.6.18 Miles of unauthorized routes in High and crucial value habitats in Elk winter habitat.

Unauthorized Routs in Elk winter range	Miles
High	11.43
Crucial	2.74

Table 4.6.19 The miles of unauthorized routes in crucial elk winter habitat by analysis area.

Analysis Area	Miles
South fork	0
Ogden	0.49
Willard	1.8
Monte Cristo	0
Curtis	0.447
Total	2.737

Table 4.6.20 The miles of unauthorized routes in high value winter habitat by analysis area.

Analysis Area	Miles
Curtis	2.98
Monte Cristo	0.22
Ogden Front	0.774
Willard	7.95
South Fork	0.268
Total	12.2

Table 4.6.21 The miles of unauthorized routes in high value summer habitat for elk by analysis area.

Analysis Area	Miles
Curtis creek	54.12
Monte	15.1
Willard	14.7
South Fork	1.16
Ogden	0
Total	85.08

The tables show that most of the unauthorized routes occur within summer habitats (approx. 85 miles). Only 2.74 miles occur in critical winter habitats and 12.2 miles occur within high value winter habitat for elk. Those that occur within the winter habitat mostly occur within the Willard area in Public Grove. Public grove and Willard are closed during the winter so the effects to elk winter habitats are mostly minor.

The figures below show the patch sizes under the preferred alternative (figure 1) and the reduction of patch sizes due to the presence of unauthorized routes (figure 2). Table 4.6.22 shows the reduction in acreage of patch size. Most of the reduction occurs within the Curtis, Willard, and Monte analysis areas. Although the Willard area does have elk use seasonally, it does not support large elk herds. The areas most populated by elk are the Curtis and Monte Cristo areas. Therefore the greatest effect from reduced patch size occurs within those areas.

An additional 3620 acres of patch may be prone to additional unauthorized routes, most of which is within the Mullen's hollow patch. Most of the other prone areas are isolated away from routes. Now that we have an estimate of the unauthorized routes, we have a tool to target the most important areas for closure. These areas would be targeted and, over the long term, may include barrier construction to protect elk patch size and reduce effects on elk. Barriers and closures in these areas may include gates, felled trees, boulders, fencing, ripping and restoration, or other similar methods.

Table 4.6.22 Patch size for elk including those from authorized routes and patch size after unauthorized routes are include. The difference shown in the table is the difference in acreage between patch size after authorized and unauthorized routes are considered.

Total Patch Area Available Without the Presence of Motorized Roads	Total Acres
Patch size from authorized routes only	87,355
Patch size after unauthorized routes are added	63,564
Difference	23,791



Figure 4.6.3 Patch size for elk under the preferred alternative. Patches are in green, 1/2 mile buffers around authorized motorized routes are in light blue.

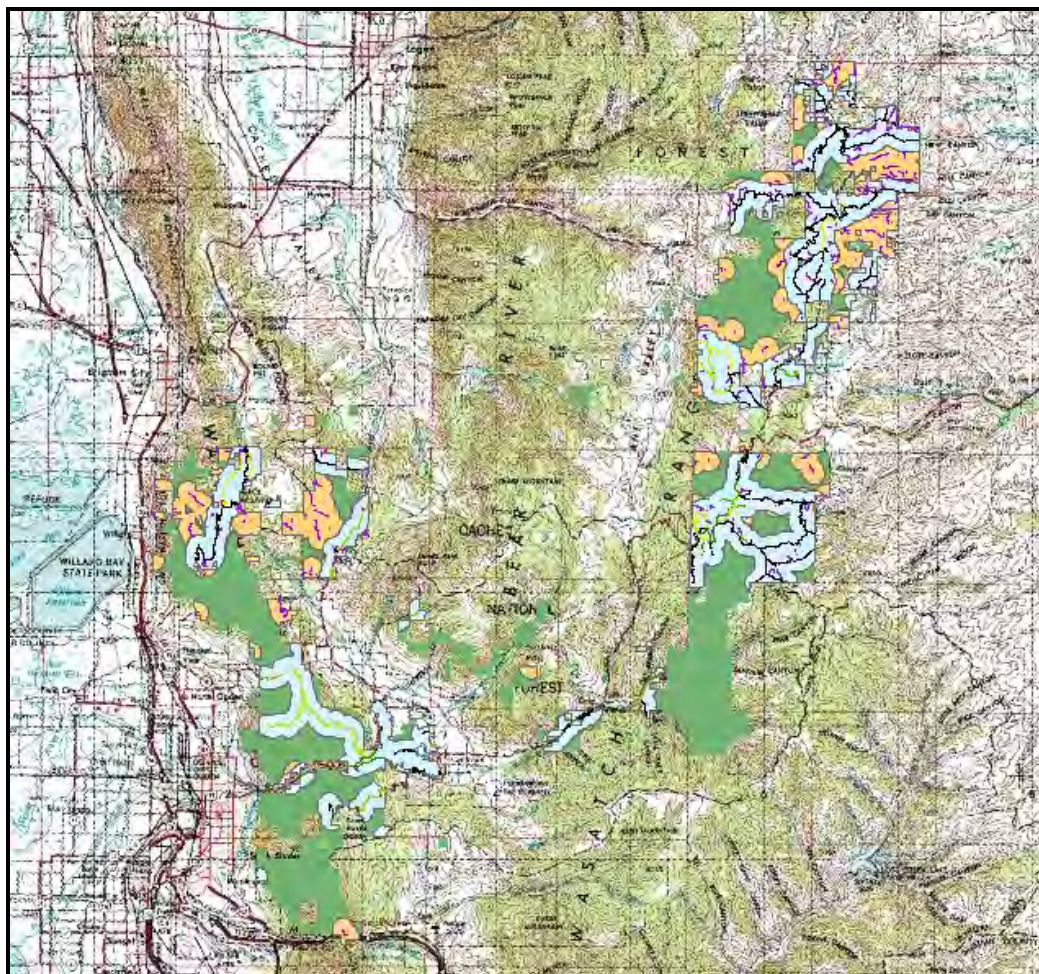


Figure 4.6.4 Patch size reduction due to unauthorized routes. Unauthorized route 1/2 mile buffers are in tan, and unauthorized routes are shown in purple. Authorized routes are shown in black and 1/2 mile buffers are shown in light blue. Patches are in green.

Alternatives designed to allow more human use and more roads would have greater effects than alternatives that favor wildlife or Roadless areas. Increases in the number of authorized routes would result in more unauthorized routes because authorized routes provide additional access to unauthorized routes or areas prone to new route development. The main effects of unauthorized routes occur when these routes are located within summer elk habitats. Use of these routes during the winter is uncommon because deep snow and seasonal closures prevent the majority of use during the winter.

We found through our surveys that the use of unauthorized routes varies and in general these routes are used less than authorized routes. Furthermore, more than half (60%) of these routes are effectively closed by single point closures. Forest Service staff has attempted to close most access points originating from authorized routes, even though the effectiveness of these closures vary. Because of these factors, effects to elk from unauthorized routes are less than what occurs from authorized routes.

Nevertheless the reduction in patch size due to unauthorized route travel is significant, and thus reduces usable space for elk. Because elk are sensitive to motorized vehicle use, they may be

pushed into more remote areas whenever these routes are driven. This may cause them to utilize forage in these areas more intensely than areas near roads. This may in turn affect aspen in these areas because aspen far away from roads may receive more grazing pressure from elk.

Times of the year when these routes likely receive the most use is during hunting seasons when people are seeking out big game. In these cases, the duration of intense use lasts for a few weeks during the rifle deer and elk hunts, and mostly on the weekends. During these times the effects from unauthorized routes are more intense but are short lived where elk are temporarily displaced from their preferred areas.

Despite these effects, elk numbers have grown considerably over the last 25 years statewide, and are above objectives set by the UDWR in the Ogden and Cache hunting units. The elk population is controlled almost entirely by hunter harvest through the issuing of cow tags. The patch size and the miles of unauthorized routes represent the worst case scenario for elk, and in reality, are likely reduced from this level because of the lower amount of use that unauthorized routes tend to get. It is also highly dependent upon which routes are used. For example, unauthorized routes which penetrate far into the patches have a more pronounced effect than those that only penetrate a short distance. Most of the unauthorized routes (90%) are shorter than 0.41 miles and the average unauthorized route length is 0.19 miles. This analysis also provides us tools to focus enforcement efforts in areas of the most important habitats (ex. Mullen's hollow patch), which may allow us to reduce the effects on elk. The effects from unauthorized routes are therefore moderate under the preferred alternative (alternative 5) and are intermediate compared to other alternatives.

Mountain Goat

As described in the original wildlife analysis of the EIS, mountain goats can be sensitive to roads. In the case of the Willard mountain goat herd, the effects from unauthorized routes are likely slight because the goats use steep rocky cliff areas not prone to routes. The main exceptions to this are unauthorized routes that travel up to the ridges above the goat habitat and those that come up from the bottom near the towns of Willard and Brigham City. In these instances goats would temporarily be displaced from habitat. These effects are mitigated through the use of seasonal closures to the authorized routes and therefore the unauthorized routes are not accessible during sensitive times.

Furthermore, these effects are tempered because there are areas away from unauthorized routes that goats can use as alternative habitats. Therefore the effects of unauthorized routes are likely negligible on goats under the preferred alternative. Other alternatives, which include more authorized roads, and thus more access to unauthorized routes, would have greater effects on mountain goats. The preferred alternative is intermediate compared to other alternatives.

Add the following to section "4.6.3.3. Effects on Federally Listed Threatened, Endangered, Proposed, and Candidate Species" on page 4-30 of the Ogden Travel Plan FEIS

Lynx

Lynx are not considered residents of the Ogden Ranger District and the occurrence of lynx within the District results primarily from lynx dispersing from and to other areas. Therefore emphasis is placed on maintaining connectivity between populations in Colorado and Idaho.

More than half (60%) of the unauthorized routes are effectively closed by single point closures. Forest Service staff has attempted to close most access points originating from authorized routes, even though the effectiveness of these closures vary. Because of these factors, effects to lynx from unauthorized routes are less than what occurs from authorized routes. Unauthorized routes are not likely a barrier to dispersal to lynx and therefore have negligible effects on the travel corridor for lynx. The effects to snowshoe hares (lynx prey) are also negligible (see Snowshoe hare analysis in the MIS Section of the Original EIS).



Figure 4.6.5 The regionally significant wildlife corridor

Greater Sage Grouse

Sage grouse were found to be warranted for listing under the Endangered Species Act, but were precluded due to higher priority species. Therefore the greater sage grouse was declared a candidate species under the Endangered Species Act. The sage grouse is also a Regional Forester's Forest Sensitive Species. There are a variety of ways motorized roads affect sage grouse. Examples of how roads affect sage grouse include direct habitat loss, fragmentation, disturbance of lek and nest site, direct mortality from vehicle strikes, provide travel corridors to predators, provide a pathway for invasive plants, and provide access to humans. Sage grouse are a landscape scale species and need large continuous tracts of sagebrush for survival.

Unfortunately factors that contribute to the unintended creation of unauthorized routes (areas less than 30% slope and open habitats such as sage brush) also occur in sage grouse habitats.

Unauthorized routes in sage brush are also the more difficult areas to close because users can simply go around any closures structures or signs.

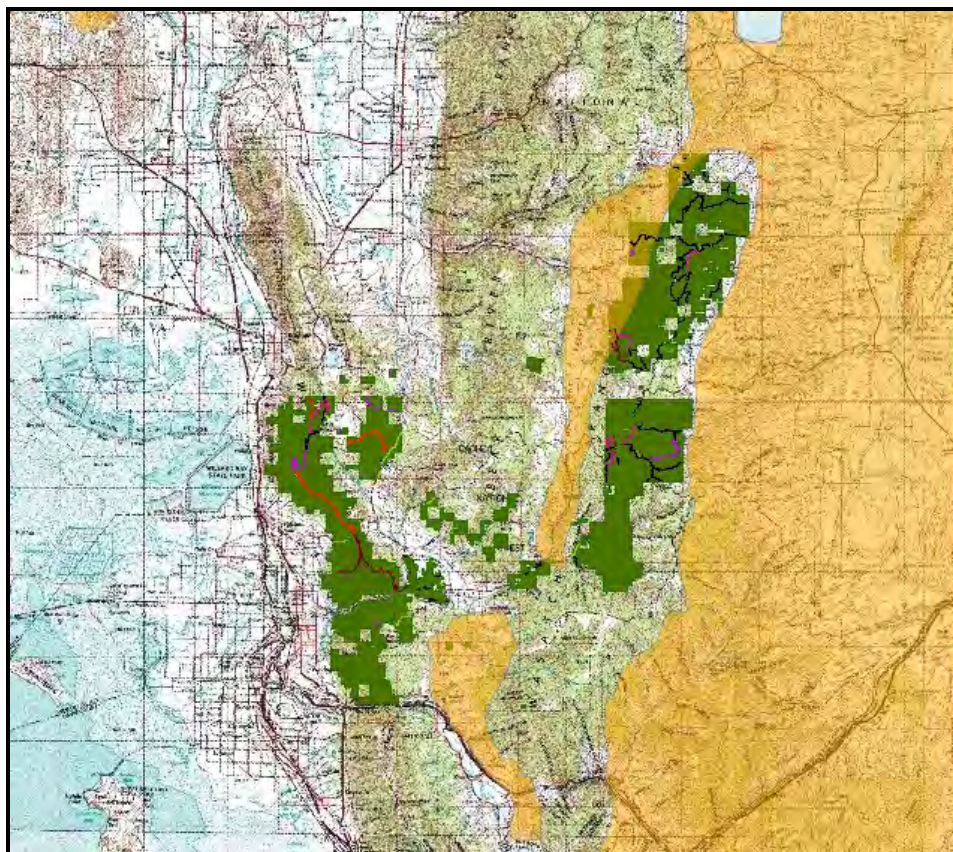


Figure 4.6.6 Sage Grouse habitat in relation to the Ogden Ranger District. Forest Lands are represented in green, and sage grouse habitats are represented in orange.

Sage grouse are known to prefer flat areas and depend on sage brush habitats. There are approximately 10,137 acres of sage grouse habitat delineated on the Ogden Ranger District (As delineated by the UDWR). The majority of the sage grouse habitat on the district occurs on the west side of the Curtis Analysis Area. Sage grouse that use forest lands mostly reside down on the Ant Flat Area, but may come up seeking moister habitats in late summer when lower elevation areas are dry. The sage grouse habitat was delineated by the UDWR as a state-wide sage grouse distribution and therefore includes areas not used by sage grouse as well as areas used by sage grouse. It is likely that some of the areas on the forest are delineated as sage grouse habitat but are not used by sage grouse. For example conifer and other non-sage brush habitats are not used by sage grouse, but some of these habitats are included within the UDWR's sage grouse habitat area. Likewise, some areas used by sage grouse fall outside of these delineated habitats. The majority of sage grouse habitat within Northern Utah falls outside of the Ogden Ranger District boundaries. Those habitats that do occur on the district represent a small percentage of the sage grouse habitat within Northern Utah (Figure 4.6.6).

Out of the 10,137 acres of sage grouse habitats occurring on the district, approximately 1,338 acres of habitat may be susceptible to the unwanted creation of unauthorized routes. Routes within prone areas would have a more pronounced effect because sage grouse are known to avoid steeper areas. Therefore any newly developed routes within sage brush would likely travel through preferred sage grouse habitats.

The majority of sage grouse leks in Northern Utah around the Ogden Ranger District occur more than 4 miles from Forest lands. There are no leks within forest lands on the Ogden Ranger District, the closest leks are in the Ant Flat area, which are between 1 mile and 0.9 miles away. The other lek located near forest boundaries is in the eastern area of the Curtis analysis area approximately 0.5 miles from the forest boundary. Nesting habitats are usually located within 2 miles of lek locations. Therefore the Ogden Ranger District is not used much for nesting because most sage grouse nest near leks. Most of the use of the Ogden Ranger District by sage grouse is likely as brood rearing areas in late summer.

In the original EIS, the wildlife analysis found that the miles of roads varied by alternative and that the preferred alternative would include 19.54 miles of road in sage grouse habitats. Most of these roads were in use prior to the EIS decision. Some of these authorized roads (6.21 miles) would be closed seasonally to protect wildlife or other resources, which makes some of the unauthorized routes unavailable during nesting and leking seasons. An additional 10 miles of unauthorized routes occurs within sage grouse habitats on the Ogden Ranger District resulting in road densities of 1.87 miles/square mile within sage grouse habitats. Road densities within sage grouse habitat are higher than the average densities across the district.

We found through our surveys that use of unauthorized routes varies and in general these routes are used less than authorized routes. Furthermore, more than half (60%) of these routes are effectively closed by single point closures. Forest Service staff has attempted to close most access points originating from authorized routes, even though the effectiveness of these closures vary. Because of these factors, effects to sage grouse from unauthorized routes are less than what occurs from authorized routes. Nevertheless many of the unauthorized routes within sage grouse habitat probably are not closed effectively because of the lack of physical barriers to prevent use.

The amount of unauthorized routes does not vary by alternative. However, the use of these routes probably varies by alternative and is related to their proximity to authorized routes. Likewise, the probability of the unintended creation of new unauthorized routes probably does vary by alternative. For example, more unauthorized routes might occur when more authorized roads pass through locations with landscape features that favor new road creation, such as areas with slopes less than 30% in combination with open vegetation types (ex. grasslands).

Those alternatives that provide more miles of road have more effects for sage grouse than those that have less miles of road. The preferred alternative is intermediate in the miles of roads and their proximity to known unauthorized routes. The Forest now has a data layer that can be used to identify and target unauthorized routes for closure in sage grouse habitat to reduce effects on this species. Within the context of the sage grouse habitat in Northern Utah, the percentage of sage grouse habitat affected by unauthorized routes on the Ogden Ranger District is small. Therefore the effects to sage grouse as a whole from these routes are also small. Therefore unauthorized routes may affect individuals or their habitat but will not likely lead to a trend towards federal listing or a loss of population viability. Therefore unauthorized routes may affect, but are not likely to adversely affect the sage grouse.

Add the following to section “4.6.3.4 Effects on Forest Service Intermountain Region Sensitive Species” on page 4-34 of the Ogden Travel Plan FEIS

Grey Wolf

The Ogden Ranger District occurs entirely within the Delisted Zone for Wolves in Utah. The delisted zone for wolves is generally north of I-84 and east of I-15. The grey wolf is a forest sensitive species. During the past several years, sightings of wolf-like animals have occurred in Utah. Many of these have been identified as wolf-dog hybrids. Dispersing individual wolves are known to have periodically crossed into Utah since 2002. In 2002, a wolf from Yellowstone National Park was captured near the town of Morgan in northern Utah, southeast of Ogden. The animal was returned to Grand Teton National Park where it later rejoined its pack. To date, there has not been a breeding pair of wolves in Utah, though it is likely that dispersing wolves will again wander down into Utah in the future.

The 2010 Utah legislature passed SB 36, which directs the Utah Division of Wildlife Resources (UDWR) to prevent the establishment of a viable pack of wolves within the delisted portion of Utah. In the event that a pair of wolves is sighted, or denning behavior is observed within the delisted zone, SB 36 requires that the wolves be lethally removed by the UDWR. If a single wolf is observed in Utah, the sighting will be documented but does not require any further response from the UDWR (SB 36, 2010). The Ogden Ranger District most likely serves as a travel corridor for wolves to disperse from the Greater Yellowstone Area into other parts of Utah and Colorado (see figure 3). Despite these challenges for wolves, this document examines the effects of unauthorized routes for wolves both in how it affects the travel corridor, and their habitat.

As evaluated in the original EIS, wolves have been shown to be sensitive to road densities. Within the Rocky Mountains wolves occurred in road densities as high as 4.02 miles/ square mile, though vehicle traffic on those roads may differ from those on the Ogden Ranger District.

Road densities on the Ogden Ranger District were evaluated in the original EIS without including unauthorized routes. Here we evaluate road densities and include the unauthorized routes to disclose effects. Road densities on the Ogden Ranger District range from 0.56 miles/square mile to 1.53 miles/square mile and average 1.02 miles/square mile across the district (table 4.6.23). The most important areas for wolves on the Ogden Ranger District are likely the Monte Cristo and Curtis Creek areas because they are the habitat most likely to contain wolves. When unauthorized and authorized motorized routes are considered, road densities are 1.08/sq. mile for the Monte Cristo area, and 1.53 miles/sq. for the Curtis Creek Area. Road densities vary within each of these areas where there are large patches without roads (see section on patch size for elk, and Appendix B of the original EIS).

The effects of road densities on wolves habitat probably varies by the amount of usage roads receive, and the distribution of roads within the landscape. For example, highly used roads within preferred wolf habitat would have a larger effect than infrequently used roads, or roads within marginal habitat. Effects might also vary depending upon the average speed of travel along those roads where faster speeds would have more effects than slower speeds. More roads in wolf habitat might result in greater exposure to poaching. This may be the most important factor when evaluating the ability of wolves to use the area as a wildlife corridor.

Table 4.6.23 Road density within each analysis area. The road density estimates include both authorized and unauthorized routes.

Analysis Area	Miles of road/Square Mile
Monte Cristo	1.08
Curtis Creek	1.53
Ogden	0.58
South Fork	0.56
Willard	1.32
Average	1.02

We found through our surveys that use of unauthorized routes varies and in general these routes are used less than authorized routes. Furthermore, more than half (60%) of these routes are effectively closed by single point closures. Forest Service staff has attempted to close most access points originating from authorized routes, even though the effectiveness of these closures vary. Because of these factors, effects to wolves from unauthorized routes are less than what occurs from authorized routes.

The amount of unauthorized routes does not vary by alternative. However, the use of these routes probably varies and is related to their proximity to authorized routes. Likewise, the probability of the unintended creation of new unauthorized routes probably does vary by alternative. For example, more unauthorized routes might occur when more authorized roads pass through locations with landscape features that favor new road creation, such as areas with slopes less than 30% in combination with open vegetation types (ex. grasslands).

Those alternatives that provide more miles of road have more effects for wolves than those that have less miles of road. The preferred alternative is intermediate in the miles of roads and their proximity to known unauthorized routes. However, there are large areas without roads in the Monte Cristo and Curtis Creek are. Unauthorized roads do not serve as barriers to dispersing wolves. Although roads have an effect on wolf prey, the elk population is above objectives and therefor likely could provide food for wolves. Therefore unauthorized roads have slight effects on wolves.

Northern Goshawk

The Northern Goshawk is also a Management Indicator Species (MIS) but will be addressed here as both a Forest Sensitive Species and as an MIS species. The effects of unauthorized routes depend upon their proximity to goshawk nests and how frequently they are used. To a lesser degree, there may also be effects to goshawks if unauthorized routes occur within Post Fledging Areas (PFA's). A PFA is approximately 420 acres not including the 30 acre nest area buffers. Combined these result in a buffer of approximately 450 acres around nests which is approximately a 762 meter radius around nests. The proximity to known goshawk nests are shown in the table below. I used the locations of known goshawk nests to evaluate the distances, miles of road within PFA, and miles of road within nesting areas. There are likely other goshawk nests that are not known within the Ogden Ranger District as all areas have not been surveyed. The distance from unauthorized routes ranges from 13 m up to 3545 m and averages 549 meters away. The average distance is skewed by the M territory which is much farther away than most other nests. Without this nest included, the average distance is 373 m.

Table 4.6.24 The distances (meters) of unauthorized routes from known goshawk nests.

Nest	Distance (meters)
RT A	466
RT C	516
RT B	659
OC D	945
OC C	813
OC A	56
SB A	183
SB B	20
SB C	226
DF D	133
DF B	307
DF C	652
WC A	612
M	3545
RW A	13
RW B	353
RW C	167
Wcu A	214
Average	549

Note: The nest abbreviations may not match those in the original EIS.

The miles of unauthorized routes within the PFA areas is approximately 5.8 miles, most of which lay within the Curtis analysis area. Most, if not all of these unauthorized routes originate from roads which are authorized under all alternatives. Some of them are known to be closed effectively while others have had attempts at closure with varying effectiveness. In most cases these routes see little use.

An analysis of the amount of acreage within the PFA that may be subjected to possible new routes is approximately 2907 acres. Even though these areas have characteristics that lend themselves to creation of routes, it does not mean that routes will form in these areas. Factors associated with the creation of unauthorized routes also depend whether there is a desirable place to go. For example many of our unauthorized routes travel to landscape features of interest such as water sources, ridgelines, mountain peaks, etc. Not all of these areas have these features and most goshawk nests occur away from these areas of interest.

The mile of road within the 30 acre nest buffer is approximately 0.55 miles. The most acute impact to goshawks would be disturbance to nests from motorized traffic. The proximity of authorized routes to unauthorized routes probably influences the amount and frequency of use of each of these unauthorized routes. A portion of the unauthorized routes are closed, and the use on these routes varies and is generally less than authorized routes. Therefore there are fewer effects from unauthorized routes than authorized routes.

We have some evidence that goshawk tolerate some disturbance from motorized travel. For example, some of our goshawk nests are very near to authorized routes, and are often successful in fledging young. They are also re-used yearly. Although there is disturbance effects on some individual goshawk nests, the presence of unauthorized routes will not likely lead to a population

decline or a trend towards federal listing. They will not affect the population as a whole across the Uinta Wasatch Cache National Forest. We now have a tool to target unauthorized routes for closure. In general, alternatives that favor more routes would have more effects than those that favor fewer routes. The preferred alternative is intermediate to other alternatives in the number and mileage of new routes. The preferred alternative may affect individuals or their habitat but will not likely lead to a trend towards federal listing or a loss of population viability.

Wolverine

This section evaluates the effects of unauthorized routes on wolverines. Sightings of wolverines are rare within Utah. They are not known to be permanent residents within the Ogden Ranger District but the area serves as a travel corridor for the species. According to published scientific studies, wolverines appear to avoid roads. Carroll, et al (2001) suggested occurrences of wolverine declined when road densities exceeded 1.7 km/km² (2.74 miles/mile²). The effects of road densities were evaluated in the original EIS but unauthorized routes were not included in that analysis. Here I evaluate road densities of authorized motorized routes and include unauthorized routes. Road densities on the Ogden Ranger District average 1.02 miles of road/square mile (Table 4.6.23), which is less than the threshold reported by Carroll et al. (2001). None of these unauthorized routes would prevent travel through the area because they are generally rough roads that generally get less use than authorized routes.

The amount of unauthorized routes does not vary by alternative. However, the use of these routes probably varies by alternative and is related to their proximity to authorized routes. Likewise, the probability of the unintended creation of new unauthorized routes probably does vary by alternative. For example, more unauthorized routes might occur when more authorized roads pass through locations with landscape features that favor new road creation, such as areas with slopes less than 30% in combination with open vegetation types (ex. grasslands).

Those alternatives that provide more miles of road have more effects for wolverines than those that have less miles of road. The preferred alternative is intermediate in the miles of roads and their proximity to known unauthorized routes. However, there are large areas without roads in the Monte Cristo and Curtis Creek area. Unauthorized routes have slight to negligible effects on wolverines passing through the area.

Flammulated Owls

In the EIS wildlife analysis the determination was that some individual flammulated owls would possibly have some effects from roads due to disturbances within areas known to have flammulated owls. I evaluated the locations of unauthorized routes in relation to known flammulated owl nesting areas. Most of the unauthorized routes in the public grove area occur outside of known nesting areas for flammulated owls. However, there are 2.5 miles of unauthorized routes in aspen habitats within the Willard and Public Grove areas that may cause some slight disturbance. These unauthorized routes are not necessarily where the flammulated owl nests are known to occur. The effects are probably intermittent and would only cause slight negative effects if any. There are likely other flammulated owl nests that have not been documented on the Forest and unauthorized routes may pass by some of these nests. The effects are probably slight overall even though some individual nests may be affected. Therefore the effects of unauthorized routes on flammulated owls may affect individuals or their habitat but will not lead to a trend towards federal listing or a loss of population viability.

Sharp-tailed Grouse

There are approximately 1.45 miles of unauthorized routes within sharp-tailed grouse habitat within the Ogden Ranger District Boundary. These routes are approximately 1.7 miles away from the nearest sharp-tailed grouse lek. Most sharp-tailed grouse nest and brood their young within 1 mile of their lek. Unauthorized routes may fragment habitats and result in a small amount of lost habitat where these routes occur. However, these lost habitats are minor within the context of their overall habitat because they represent a small percentage of the overall sharp-tailed grouse habitat. These unauthorized routes originate from one of the seasonal motorized routes and therefore are not open during nesting and leking periods. Uses of unauthorized routes within sharp-tailed grouse habitats probably do not affect sharp-tailed grouse. Therefore, the effects of these routes are minimal to no effect. The preferred alternative is intermediate in effects compared to other alternatives.

Add the following to section “4.6.3.2 Effects on Management Indicator Species” on page 4-27 of the Ogden Travel Plan FEIS

The Northern goshawk, Snowshoe hare, and Beaver are identified as Management Indicator Species for the Wasatch-Cache Planning Area. In the original EIS for the Ogden Travel Plan, the beaver and snowshoe hares were determined to have negligible effects from any of the alternatives. I also evaluated these species for effects from unauthorized routes and found that any effects to these species from unauthorized routes would also be negligible and therefore they are not addressed in this supplemental in detail. Neither species would suffer any population declines as a result of unauthorized routes on the Ogden Ranger District. Goshawks were addressed above under Forest Sensitive Species.

Add the following to section “4.6.3.5 Effects on Neotropical Migratory Birds” on page 4-39 of the Ogden Travel Plan FEIS

Three bird species were identified as receiving effects in the original EIS, the brewer’s sparrow, Virginia’s warbler and Black-throated grey warbler. The original EIS determined that three species would be affected when authorized routes fell within their habitats. This section of the supplemental evaluates the effects of unauthorized routes on these three species.

Brewer’s Sparrow

The Brewer’s sparrow is a sage brush obligate species that is fairly common in sage brush habitats statewide. However, because sage brush habitats face many threats, and because of a declining population trend in other states, the Brewer’s sparrow was identified as a priority species by Partners in Flight.

Parrish, et al (2002) identified habitat loss and fragmentation (caused by roads and trails) as a concern related to the Brewer’s sparrow. They also mention fragmentation is known to be a factor in increasing cowbird parasitism. Parrish, et al (2002) recommended the following for the conservation of the Brewer’s sparrow with regards to road management, “Avoid road and right of-way construction in large, contiguous patches of shrub/steppe habitat. Manage large blocks of land for contiguous shrub steppe habitat and avoid activities that cause fragmentation. Re-vegetate old roads and other disturbance corridors to native grasses and shrubs.”

The alternatives with fewer miles of road and motorized trail within the grass/shrubland vegetation type will likely have less effect on the Brewer's sparrow.

Impacts from unauthorized routes result when sage brush habitats are reduced and fragmented. Reduction occurs because habitat is lost where routes develop, and fragmentation occurs when large sagebrush tracts are broken into smaller sections by unauthorized routes. The miles of unauthorized routes do not vary by alternative. However, the proximity of authorized routes to the unauthorized routes probably does vary and may influence use of the unauthorized routes. The mile of unauthorized routes within sagebrush/grassland habitat is approximately 72.4 miles. Furthermore, the miles of routes that travel through areas prone to new unauthorized routes (flat areas that have open vegetation types), probably would influence the development of new unauthorized routes. Unfortunately, open vegetation types are more likely to develop new unauthorized routes, and they can be harder to close without physical barriers. The alternatives with fewer miles of road and motorized trail within the grass/shrubland vegetation type will likely have fewer unauthorized routes develop, and thus have less effect on the Brewer's sparrow. The preferred alternative is intermediate in the miles of routes through the grass/shrub habitat types compared to other alternatives. Unauthorized routes will continue to be closed in Brewer's sparrow habitats.

Virginia's Warbler

Virginia's warbler habitat consists of Juniper and oak habitats. The miles of authorized road under the preferred alternative are 4.71 miles within juniper habitats and 22.29 miles in oak habitats. The miles of road in each habitat type was intermediate to other alternatives. The miles of unauthorized routes in oak and juniper habitat are 7.5 and 4.05 miles respectively (Table 2). Comparatively, there are approximately 5,564 acres of pinion-juniper habitat and 34,837 acres of Gamble's oak habitat on the district. The development of new routes within these habitats types becomes more likely when they occur in flat areas. Virginia's warblers nest on the ground in dense thickets of brush. Areas of dense brush, especially in oak habitats are not likely to develop unauthorized routes. Rather unauthorized routes that develop within oak habitats are usually created in the spaces between oak patches. Therefore these unauthorized routes most likely would not impact nesting habitats in oak. Alternatives where more routes are authorized in juniper and oak habitats would provide users access to more areas of unauthorized routes and therefore it may result in more effects to Virginia's Warbler. The preferred alternative is intermediate in the miles of routes in both habitat types compared to other alternatives. The effect on Virginia's Warblers from the presence of unauthorized routes is slight because the area of available habitat is large compared to the acres disturbed habitat.

Black-Throated Gray Warbler

The primary habitat for the Black-throated gray warbler in Utah is Pinion-Juniper habitats. There are approximately 4.05 miles of unauthorized routes within this habitat type. The amount of pinion juniper habitat available on the Ogden Ranger District is approximately 5494 acres. The amount of habitat is large compared to the amount of habitat disturbed. Therefore, effects to the black-throated gray warbler from unauthorized routes are slight.

Add the following to section “4.6.3.6 Effects on Species at Risk” on page 4-41 of the Ogden Travel Plan FEIS

American Marten

In the original EIS, the determination of effects to American martens was as follows:

“Marten are vulnerable to the effects of trapping, which can be influenced by access provided by roads and trails. Marten trapping is not allowed on the Ogden RD. Currently, only the northeastern portion of Utah is open to marten trapping according to the 2004-2005 UDWR Furbearer Proclamation (UDWR 2004-2005). Thus, any changes in accessibility will not influence marten populations. The alternatives with fewer miles of road and motorized trail within the conifer vegetation types may have less effect on marten habitat, especially within the Curtis analysis area.”

The miles of unauthorized routes within conifer habitat types are approximately 68.47 miles. Use on these routes is less than authorized routes and likely do not have the same magnitude of effects as authorized routes. The acres of conifer habitat (mixed conifer, conifer-aspen, Lodgepole pine, Douglas fir, Spruce-fir) are approximately 47,118 acres. Therefore the effects of unauthorized routes on American martens is probably slight because there are a large amount of acres of habitat compared to the area disturbed by unauthorized routes.

Add the following to section “4.7.4 Direct and Indirect Effects” on page 4-43 in the Ogden Travel Plan FEIS.

4.7.4.4 Effects of Unauthorized Off-Road Vehicle Use on Recreation

The analysis of the inventory of existing Unidentifiable User Feature (UUF) identified 1123 segments of various lengths on National Forest lands in the Ogden Ranger District. A review of this data was made to determine which were created by motorized recreation and which segments were caused by other types of activities.

Table 4.7.9 Unidentifiable User Feature Inventory (UUF) segments categories

UUF attribute	Total Miles	Description
Ski trail	3.41	Cleared winter trails at Snowbasin
Dispersed	6.24	Motorized travel routes used as access to dispersed camping. Less than 150 feet from the system road.
Fenceline	27.07	Feature known as an existing fence
Hiking	17.05	System trail used for non-motorized use or motorcycle only (Skyline trail)
Not a route	27.68	UUF that were not used by motorized travel or utility corridors. Often identified as cattle or wildlife trails.
Private	14.53	UUF on private property. Many were caused by motorized travel routes.
Service	7.23	Waterline, phone or power lines portion of routes or access to utility lines outside of the utility corridor or water developments
Utility	10.46	Waterline, gas, phone or power lines
Travel route	97.08	Unauthorized motorized travel routes

Of the total miles of UUF segments, 97.08 miles were categorized as clearly caused by human activities like motorized recreation. The data was reviewed by the Ranger District recreation staff with a combined history of over 30 years' experience on the Ogden Ranger District. As these segments were reviewed, it was observed that a large number of these routes have received attempts to eliminate the motorized use on them. This usually is in the form of installation of a sign prohibiting motorized use on that UUF. In some known cases, it also included the installation of a barrier to prevent motorized use.

The Travel Route segments were analyzed in two methods to measure recreation related effects to the National Forest management of these recreation activities.

We know that during normal Travel Management activities performed by the District Staff, there are segments or routes that are easier to manage based solely on their proximity to an existing open route. When the Travel Management work crew can drive to or by the segment in question, we assumed that that route can be effectively obliterated and not allowed to be used by the public. Those segments or routes that were further away from an open route tend to be more difficult and less successful to eliminate motorized uses.

UUF segments identified as a Travel Route could potentially continue to have motorized uses if they intersected with a new open road, new motorized trail, or a constructed new road identified in the EIS alternatives.

Based on the assumption that new motorized routes will open access to the inventoried Unidentifiable User Feature Inventory, a review of routes that intersect a new road, new motor trail, or a new open road was completed. The following table shows the number of UUF segments and the total sum of the miles of those UUF routes by alternative.

4.7.10 Miles of UUF segments adjacent to New Open Roads, New Motor trails, and New Roads

Alternative	Segment Count	Miles
Alternative 1	52	8.31
Alternative 2	83	11.54
Alternative 3	43	5.75
Alternative 3a	47	5.74
Alternative 4	0	0
Alternative 5	58	7.48

The comparison of miles by alternative is consistent with the theme of each alternative. More new routes were proposed on alternatives emphasizing human activities and fewer routes were proposed in areas with protected resources (wildlife, roadless areas).

UUF segments that are more than 0.1 mile from any type of open route, by alternative, would be more difficult to close and manage.

An analysis of UUF segments that would be more difficult to manage was done using GIS mapping software. An assumption was developed that stated that the location and proximity of the segments to an existing managed system route, which changed by alternative, would identify segments that would be more difficult to close and prevent future motorized uses. If a segment

was more than 0.1 miles away from an existing route, it was assumed that during the course of normal travel management activities, that segment may not readily receive active management efforts.

By mapping these more difficult routes, the Ranger District has a new tool to identify work projects in future years. The preliminary plan is to identify an appropriate area of National Forest with the intent to visit each of these identified segments and complete the appropriate work necessary to rehabilitate the ground. This effort has begun this season in a limited amount.

4.7.11 Miles of Difficult to Manage UUF segments by Alternative

Alternative	Curtis Creek	Monte Cristo & Wheat Grass	South Fork	Ogden Front & Pineview Reservoir	Willard & Public Grove
Alternative 1	22.94	6.41	0.89	3.76	4.97
Alternative 2	12.57	5.56	0.89	2.71	6.50
Alternative 3	15.67	5.36	0.89	2.13	6.82
Alternative 3a	13.42	5.13	0.89	1.93	7.49
Alternative 4	13.97	9.16	1.22	2.03	16.46
Alternative 5	12.81	5.74	0.75	2.71	6.36

In conclusion, the effects to motorized recreation caused by unauthorized motorized travel routes are clarified by the persons' viewpoint. Those who desire to follow the rules and regulations determined by the Land Management Agency will not ride on those routes obviously created by a rider travelling off the road. It is the duty of the Agency to remove, obliterate, discourage, or prevent unauthorized routes from so much continual use that they begin to look like an approved part of the Transportation System.

Those citizens that prefer to disregard the Land Management Agency policy of motorized travel only on "Authorized Routes", which has been the policy on the Ogden Ranger District for decades, will be affected by our continual effort to prevent this activity. The efforts in signing and closures are often criticized as showing a bias against motorized recreation. Part of the mitigation efforts needs to include information and education of why we are restoring areas and limiting motorized travel.

It is acknowledged that the efforts by the Forest Service to reduce or eliminate the environmental effects caused by unauthorized routes will need to be continued indefinitely. The ability to prevent all unauthorized travel is not possible. The priority of the Travel Management efforts by the Ranger District will be in showing an active presence either through personnel or evidence of our work to restrict travel to authorized routes only.

The mitigation and monitoring listed in Appendix D of this analysis will continue to be implemented by the Forest Service to deter unauthorized motorized uses. This will include active efforts for rehabilitation and restoration of impacted environmental resources.

The added information of the newest UFF inventory will be a valuable tool to help identify the rehabilitation and restoration work needed to be done. The effects to the environment can be determined using the inventory and effects analysis method such as done for this Travel Plan. Those areas of National Forest found to have higher concentrations of unauthorized routes will

be prioritized for implementation. This new tool will allow our efforts to be more effective and efficient and allow us to do more work and better quality.

Add the following to section “4.10.3 Direct and Indirect Effects” on page 4-55 in the Ogden Travel Plan FEIS.

4.10.3.2 Effects of Unauthorized Off-Road Vehicle Use on Roadless Areas

Each Inventoried Roadless Area was compared to the segments of UUF identified as a Travel Route created by unauthorized motorized recreation. The table below lists the miles of UTF within the boundaries of the roadless areas.

The number of segments is included to determine the average segment length within roadless areas. Nearly all of the Travel Routes identified in roadless are relatively short segments adjacent to approved motorized routes, ATV trails, and some from adjacent private property.

4.10.1 Miles of UTF in Roadless Areas

Name of Roadless area	Miles of UTF	Number of Segments	Average Length
Rock Creek – Green Fork	7.34	25	0.29
Mollens Hollow	7.48	42	0.18
Sugar Pine	2.88	12	0.24
Upper South Fork	0.29	3	0.1
Burch Creek	0.49	1	0.49
Lewis Peak	0.12	2	0.06
Willard	7.90	35	0.23

Add the following to section “4.14 Cumulative Effects Analysis” on page 4-55 in the Ogden Travel Plan FEIS.

4.14.12 Cumulative Effects conclusion related to the Shoshone ATV Trail

Although no alternatives propose changes to the Shoshone Trail, this decision will have direct impact to the trail.

The increase in open roads and motorized trails in the proximity of the Shoshone ATV trail vary by alternative. Alternative 5 adds nearly 8 miles of roads and trails newly open to motorized use. 4.41 miles of new open road are in the proximity of the Shoshone Trail in the Curtis Creek Analysis area. Alternative 2 has the next highest amount of newly available miles of motorized routes in close proximity to the Shoshone Trail with 6.35 miles. Alternative 1 is similar to the existing condition in the miles of road and trail open to motorized use adding only 0.26 miles above current levels.

Adding more motorized routes in the same area where there are designated Shoshone Trail segments will have the cumulative result of potentially increasing motorized use in an area already very popular with motorized users.

There will be a direct effect and a cumulative effect of increased illegal routes created by motorized users. There is usually a direct proportional increase or decrease in user created illegal routes linked to the relative number of ATV users. If use increased because of the draw from the Shoshone ATV trail, this effect will occur.

When the concept of the Shoshone ATV Trail originated in 2002, it was introduced into the U.S. House of Representatives as H.R. 3936. As proposed, it consisted of a system of approximately 625 miles of existing roads and trails traversing both public and private land in northern Utah. Nearly the entire proposed route on public lands consisted of already designated open to motorized travel roads and trail. The bulk of this proposal was under appropriate authorities other than the US Forest Service. If this proposal was implemented, it will have the cumulative result of greatly increasing motorized use in northern Utah. For this proposal to occur, it would require each jurisdiction to approve the routes.

Since most of the routes proposed on National Forest are currently a part of the Shoshone ATV trail complex, the potential future expansion to the entire proposed system of routes would not have much meaningful impact to the National Forest. Most of the additional cumulative effect would be to private lands west of the National Forest land. The possible additional cumulative effects would be in direct proportion to the increased amount of overall ATV activity.

Normal other forest activities have a more measurable affect to public use on the Shoshone ATV trail use. During the fall hunting season, these portions of National Forest have the highest human activity of any other time of the year. The common change in normal motorized ATV recreation, by those not hunting but riding for pleasure, is because of safety concerns with high power rifles. Trips to the area just for riding ATVs for pleasure nearly disappear.

Periodically, the roads known as the Shoshone ATV trail are used for commercial hauling of timber from Federal, State and Private lands. This has an affect from safety concerns and excessive dust produced by the trucks. Signs are posted in strategic locations warning the general public about the commercial truck traffic. If the occurrence of heavy trucks is sporadic, there will not be any noticeable effect. If the commercial traffic is large and continuous, then there would be an expected change in the level of recreation use. This activity is expected to be an annual occurrence in the foreseeable future.

The other normal activity that has a temporary affect to recreation traffic on the Shoshone ATV trail is Prescribed Fire activities. The Curtis Creek Analysis area where the entire existing Shoshone trail occurs is the most active section of National Forest for prescribed fire activities on the Ogden Ranger District. The main roads are posted with signs warning the public about the fire activity and public notices are often published in local newspapers. This usually has the cumulative result of temporarily decreasing motorized use in the area where prescribed fire activities would occur.

In conclusion, the observations of motorized recreation activities on the Shoshone ATV trail by the Ogden Ranger District personnel has continually indicated that there is not an apparent increasing trend of use caused by the naming of the routes. Obviously some of the current riders have heard of the Shoshone ATV trail or have a printed map of the routes, but probably would be

riding this area because of its proximity to the Front Range. The average rider of this system or travel routes is a local resident, described as coming from the Wasatch Front communities, who know this area from friends and family hunting or playing in the mountains east of Ogden and Logan. Any increases we observe in motorized recreation are consistent with the increased population growth in Northern Utah. Every type of recreation activity has substantially increased in the last few years, including all forms of motorized recreation.

Chapter 5

List of Preparers

Add the following citations on page 5-1 of the Ogden Travel Plan FEIS.

The following are the members of the interdisciplinary team for the Ogden Travel Plan Revision EIS.

Contributor	Education/Experience	Contribution
Michael Barry Wilderness and Trails Specialist W-C NF Supervisor's Office	B.A. Recreation, B.A. Forestry, 26 years of experience with the Forest Service	Trails and Roadless Areas
Steve Blatt Wildlife Biologist Logan/Ogden Ranger Districts	B.S. Wildlife Management, 17 years of experience in wildlife management.	Wildlife
Kevin Labrum Wildlife Biologist Ogden Ranger District	B.S., M.S., Wildlife Biology, 7 years of experience in wildlife management.	Wildlife
Jim Chard Rangeland Management Ogden Ranger District	B.S. in Range and Soil Science, 27 years of experience in range management with the Forest Service.	Range Management
Paul Chase Fisheries Biologist Logan/Ogden Ranger Districts	B.S., M.S. Fisheries and Wildlife Management, 14 years of experience as a fisheries biologist.	Aquatic Resources
Charlie Condrat Hydrologist W-C NF Supervisor's Office	B.S. Forestry, M.S. Watershed Science, 26 years of experience with the Forest Service.	Hydrology and Watershed
Mike Duncan North Zone Botanist Ogden Ranger District	B.S. Botany, 14 years of experience with the Forest Service.	Botany, Sensitive Plants, Noxious Weeds
Stacey Weems Soil Scientist U-W-C NF Supervisor's Office	B.S. Geology, M.S. Soil Science. 7 years of experience with the Forest Service.	Soils
Paul Flood Soil Scientist W-C NF Supervisor's Office	B.S. Soil Science, 25 years experience with the Forest Service.	Soils
Dave Hatch Landscape Architect U-W-C NF Supervisor's Office	B.L.A. in Landscape Architecture Environmental Planning, 15 years experience in the Forest Service.	Scenery
Juan Barrientez Road and Trail Manager Ogden Ranger District	B. S. in Fish and Wildlife Management, 13 years experience in the Forest Service.	Road Trails
Barbara Burgan Public Affairs Specialist Ogden Ranger District	Environmental Education and Volunteer Coordination, 29 years experience in the Forest Service.	Editor Public Outreach
Tom Scott NEPA and Social Science Ogden Ranger District	B.A. American History, M.A. Anthropology, 27 years experience with the Forest Service.	Team Coordination Roads Analysis
Tom Flanigan Heritage Program Manager Supervisor's Office	B.A., M.A., Ph.D. Candidate Anthropology, 10 years experience with the Forest Service as an archaeologist.	Heritage Resources
Pete Gomben Environmental Coordinator Supervisor's Office	Ph.D. in Land Use Planning, 10 years of NEPA/Forest Planning experience.	NEPA

Sendi Kalcic NEPA Coordinator North Zone, Logan Ranger District	B.S in Natural Resources Management and Planning, 8 years of natural resource planning experience.	NEPA
Darcy Stock GIS Specialist Ogden/Logan Ranger Districts	B.S. Natural Resources Geography, 7 years of experience with the Forest Service.	GIS Maps and Analysis
Robert Sanchez District Ranger Ogden Ranger District	B.S. Forest Resources 13 years of experience with the Forest Service in Hydrology and as a District Ranger.	Forest Management Leadership
Rick Vallejos Recreation Forester Ogden Ranger District	B.S. Forestry, 38 years of experience with the Forest Service in forestry, recreation, and special uses.	Team Leader, Recreation

Chapter 6 Consultation and Coordination

Replace Chapter 6 with the following on page 6-1 10 in the Ogden Travel Plan FEIS.

List of Agencies, Organizations, and Persons to Whom Paper Copies or CDs of the FEIS Were Sent

Federal Agencies

U.S. Department of Agriculture

National Agricultural Library
Natural Resource Conservation Service
USDA Animal and Plant Health Inspection Service
USDA Forest Service

U.S Department of Defense

U.S. Army Engineer Division
U.S. Coast Guard, Environmental Impact Branch

U.S. Department of Energy (USDOE)

Office of Environmental Compliance

U.S Department of Interior

Office of Environmental Project Review
U.S. Fish and Wildlife Service
Bureau of Land Management – Utah State Office

Environmental Protection Agency

Washington Office
Denver Office – Region VIII

American Indians

Shoshone- Bannock Tribe
Northwestern Band of Shoshone
Tribal Historic Tribal Preservation Office

United States District Court

United States District Court, District of Utah

Local Government

Utah Congressional Delegation

Congressman Rob Bishop
Senator Orrin Hatch
Senator Robert Bennett

State of Utah

Resource Development Coordinating Committee (RDCC)
Department of Natural Resources
Division of Wildlife Resources
Division of Parks and Recreation
Utah – Federal Highway Administration

County Governments

Cache County Commission
Rich County Commission
Weber County Commission
Box Elder County Commission

Libraries

Weber County Main Library
Ogden Valley Branch
North Branch
Brigham City Library
Colorado State University

Others

Many additional interested or affected individuals, businesses, and organizations received the Travel Plan Supplemental, Draft and Final Environmental Impact Statement for the Ogden Ranger District Revised Travel Plan.

Chapter 7 Literature Cited

Add the following citations on page 7-1 of the Ogden Travel Plan FEIS

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Parrish J., F. Howe, and R. Norvell. 2002. Utah partners in flight avian conservation strategy version 2.0. Publication Number 02-27. Utah Division of Wildlife Resources.

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Ruediger, Bill, Jim Claar, Steve Gniadek, Bryon Holt, Lyle Lewis, Steve Mighton, Bob Naney, Gary Patton, Tony Rinaldi, Joel Trick, Anne Vandehey, Fred Wahl, Nancy Warren, Dick Wenger, and Al Williamson. 2000. Canada lynx conservation assessment and strategy. USDA Forest Service, USDI Fish and Wildlife Service, USDI Bureau of Land Management, and USDI National Park Service. Missoula, MT.

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State of Utah. 2010 SB 36 Substituted. Wolf Management. 2010 General Session. Chief Sponsor: Allen M. Christensen.

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USDA Forest Service. 1994. American Marten, Fisher, Lynx, and Wolverine in the Western United States, The Scientific Basis for Conserving Forest Carnivores. Rocky Mountain Forest and Range Experiment Station, Forest Service, Fort Collins Colorado. General Technical Report RM-254.

USDA, NRCS. The PLANTS database (<http://plants.usda.gov/plants>). National Plant Data Center, Baton Rouge, LA 70874-4490 USA.

USDI Fish and Wildlife Service. 2005 Recovery Outline. Contiguous United States Distinct Population Segment of the Canada Lynx. Approved by Sharon R. Rose, Acting Deputy Regional Director, USFWS, Denver, Colorado. 21 p. September 14, 2005.

Utah Natural Heritage Program. 2013. Element Occurrence Database. Utah Division of Wildlife Resources. Salt Lake City, Utah.

W

Welsh, S.L., N.D. Atwood, S. Goodrich and L.C. Higgins. 1993. A Utah Flora (2nd ed., revised). Brigham Young University. Provo, Utah.

Wisdom, M. J., H. K. Preisler, N. J. Cimon, B. K. Johnson. 2004. Effects of Off-Road Recreation on Mule Deer and Elk. *Transactions of the North American Wildlife and Natural Resource Conference* 69: in press.

Chapter 8

Response to Comment

Add the following comments on page 8-1 of the Ogden Travel Plan FEIS.

Participation by the public and other agencies has been an integral aspect of identifying issues and concerns during the environmental analysis for the update to the Ogden Travel Plan. The issues and concerns have been considered during development of alternative ways to meet the proposal's purpose and need.

On **July 18, 2003**, the Forest Service released a scoping document announcing a proposal to update the Ogden Travel Plan. The document detailing a proposed action was sent to nearly 200 individuals, organizations, and agencies on the Ogden Ranger District mailing list. At the conclusion of the scoping period on **August 22, 2003**, over fifty responses to scoping were received that included detailed comments, a variety of concerns, and suggestions about the proposal.

Subsequently, the Forest Service responsible official determined that the project could have significant effects on the human environment that warranted elevating the analysis to an environmental impact statement ("EIS"). A Notice of Intent ("NOI") was published in the *Federal Register* on **March 31, 2004** that reopened scoping through **April 30, 2004**. The Ogden Ranger District sent out a newsletter in **April 2004** to update the recipients of the scoping letter on the project, identifying preliminary issues and alternatives, and of the intent to produce an EIS. The original scoping responses received during July-August 2003 were accepted in the EIS process.

On **December 27, 2004**, approximately 140 printed copies and 250 compact discs of the Draft Environmental Impact Statement ("DEIS") were mailed to interested parties. The release of the DEIS was followed by a period of briefings, meetings, and field trips to gather comments from the public and interested local groups. A Notice of Availability ("NOA") for the DEIS was published in the *Federal Register* on **January 14, 2005**. On **January 24, 2005**, an additional letter was sent to each party extending the comment period and including a list of corrections. An Amended Notice was published in the *Federal Register* on **February 4, 2005** and again on **February 18, 2005** extending the opportunity to comment an additional 30 days. An open house was conducted on **February 10, 2005** at Ogden Union Station; the meeting had sixty-two citizens who signed the entry log. Legal Notices for the DEIS were printed in the *Standard Examiner* on **January 21, 2005** and **February 25, 2005**. One hundred and twenty four written comments were received which contained nearly five hundred and seventy separate comments.

Two field trips were made to the Mantua Loop Trail in **October 2005**. Attendees included representatives from the private land owners, Mantua City, Brigham City, Ogden Chapter of the Sierra Club, Box Elder County Commission, Box Elder County Sheriff's Department, Cache County, Cache County Sheriff's Department, Utah Division of Parks and Recreation, Utah Division of Wildlife Resources, and the Forest Service.

Following the comment period, the Forest Service issued the Ogden Ranger District Travel Plan

Revision Record of Decision and Final Environmental Impact Statement (“ROD/FEIS”) in March 2006. The decision for the project was appealed by four separate parties. After review, the appeal deciding officer reversed the ROD/FEIS based on her finding that the environmental analysis and supporting information in the project record were not adequate to support the decision in regard to cumulative effects analysis.

In response to the decision, the Forest Service initiated additional analysis through a supplemental environmental impact statement. A NOI to prepare a Supplemental EIS (“SEIS”) to the Ogden Travel Plan Revision FEIS was published in the *Federal Register* on **July 24, 2006**.

The Forest Service created a Draft SEIS (“DSEIS”) which was issued on **March 27, 2007**. A NOA for the DSEIS was published in the *Federal Register* on **April 6, 2007**. Legal Notices for the DSEIS were printed in the *Standard Examiner* on **May 9, 2007**. Twelve letters containing two hundred and fourteen written comments were received and were incorporated into the project record.

The Forest Service issued the Ogden Ranger District Travel Plan Revision Record of Decision and Final Supplemental Environmental Impact Statement (“ROD/FSEIS”) on **September 12, 2007**. The NOA was published in the *Federal Register* on **October 12, 2007**. The ROD/FSEIS replaced discrete sections of the ROD/FEIS, rather than replacing it in its entirety, and provided additional information to augment analysis in the FEIS. The decision was successively appealed, affirmed by the appeal deciding officer, and implemented.

After denial of the appeal, legal action was taken against the Forest Service on **September 30, 2009**. As a result of litigation, on **March 7, 2012**, the U.S. District Court issued a decision order. The court instructed the Forest Service to address deficiencies in the ROD/FEIS, specifically: (1) provide notice of available support for the public to understand information cataloguing illegal routes; (2) support adequately its assumptions about the impacts of illegal user-created routes; and (3) explain explicitly its evaluation of the cumulative impacts of its decision on the Shoshone Trail System.

In response to the court order, the Forest Service initiated a supplement to the Ogden Travel Plan Revision FSEIS directed at addressing the court-identified deficiencies. A NOI to prepare a supplemental environmental impact statement to the FSEIS was published in the *Federal Register* on **January 14, 2013**.

The Forest Service issued a draft supplemental environmental impact statement (“draft SEIS”) in September 2014. A NOA of the draft SEIS was published in the *Federal Register* on **September 12, 2014**. The Ogden Ranger District sent a public comment letter on **September 15, 2014** to notify the plaintiffs on the availability of the draft SEIS and public comment period. A Legal Notice requesting comments on the draft SEIS was published in the *Standard Examiner* on **September 16, 2014**. The official 45-day comment period on the draft SEIS ended on **October 27, 2014**. Ten comments containing over two hundred specific written comments were received and were incorporated into the project record.

Briefings

Twenty separate briefings or meetings were held with interested federal and state agencies, local governments, permittees, and interested local groups. This includes congressional staff, county commissions from Weber, Rich, Cache, and Box Elder, Shoshone Tribe representative, Utah Resource Development Coordinating Committee, and Division of Wildlife Resources.

Newspaper

Newspaper articles on the intent and progress on the project work and subsequent letters to the editor on public issues were published on several occasions by the *Standard Examiner* (**August 5, 11, 13, 25; and September 8, 2003**). The *Ogden Valley News* published articles on the Travel Plan scoping and on OHV impacts in **August and September 2003** (Francis, 2003). The Utah Chapter of the Sierra Club published an article on the Travel Plan Update in its **September 2003** issue (*Sierra Club*, Vol. 36, No. 3, 2003). The *Standard Examiner* published an article on the Ogden Travel Plan draft SEIS on **November 5, 2014**.

List of Commenters

Commenter 1: United States Department of the Interior, Bureau of Land Management
Commenter 2: International Mountain Bike Association
Commenter 3: Western Resource Advocates submitted on behalf of the Utah Chapter of the Sierra Club, Wild Utah Project, Save Our Canyons and Western Wildlife Conservancy (collectively Sierra Club)
Commenter 4: United States Environmental Protection Agency
Commenter 5: Jim Trenholm
Commenter 6: Jim Trenholm
Commenter 7: Capital Trail Vehicle Association
Commenter 8: Bryce Lofthouse
Commenter 9: Jock Glidden
Commenter 10: United States Department of the Interior, Office of the Secretary
Commenter 11: Joseph Wellington Smith
Commenter 12: Albert Warner

Commenter 1 **United States Department of the Interior, Bureau of Land Management**
Received: **Telephone Conversation September 19, 2014**

Comment 1-1: Edge matching for effect to roadless and how to manage routes to/from BLM.

Response 1-1: The analysis for the Ogden Travel Plan used the Forest Service Uinta-Wasatch-Cache Forest GIS layers. The edge matching for the roadless areas was not closely checked or compared. This question will be sent to the GIS staff. The management of routes from the adjacent BLM property, which entirely reside in Rich County, should not create any unforeseen problems. Those routes tend to be long-existing roads rather than ATV trails which tend to be managed as open on the BLM jurisdiction.

Commenter 2: International Mountain Bike Association
Received: Telephone conversation October 23, 2014

Comment 2-1: Does FEIS or supplemental deal with mountain bike trails?

Response 2-1: The travel plan only analyzes motorized routes (i.e., roads and trails)

Commenter 3: Western Resource Advocates submitted on behalf of the Utah Chapter of the Sierra Club, Wild Utah Project, Save Our Canyons and Western Wildlife Conservancy (collectively Sierra Club)
Received: Letter dated October 27, 2014 received via email; Hand delivered copy October 27, 2014.

Comment 3-1: The Forest Service Has Failed to Adequately Inventory the Existing Illegal User-Created Routes.

Response 3-1: The inventory of unmapped travel features used in the analysis was an edited version of the Remote Sensing Application Center inventory projects. The complete inventory included most of the features referenced in this comment.

The DSEIS submitted for public review and comments included five maps showing, by analysis area, the inventoried unmapped travel features overlaid with the Revised Ogden Travel Plan Decision, March 2006 routes. This public presentation of the unauthorized routes intended to meet the Court order to “provide notice of available support for the public to understand the information cataloging illegal routes.” As described in the DSEIS supplemental information for Sections 3.22 on page 3-4 and again for 4.7.4.4 on page 4.40, the Ranger District staff analyzed each unmapped travel feature submitted by the Remote Sensing Application Center. The goal was to determine which of the travel features were caused by human activity and in particular motorized recreation. The result of this analysis was a subset inventory for analysis that had less features than the original submitted inventory.

Additionally, during the unmapped travel features review, those routes that had been physically closed in the recent past were not carried forward for site-specific analysis. This is partially the reason that some of the routes referenced in the comment were missing from the DSEIS maps.

New maps are created showing the entire unmapped travel feature inventory provided by the Remote Sensing Application Center without editing. This version shows routes that extend beyond the Forest Service property as well as mysterious route segments that do not seem to connect to anything known.

This total inventory still has some unmapped travel features that do exist on the ground but did not get mapped. This circumstance is the exception rather than the rule. You gave an example in Exhibit 1 of a route that partially mapped in the inventory but did not connect to the existing open Public Grove ATV trail. This as well as the second example given is routes that were physically closed by our field work crew. Your recent field review of these routes showed that the closure has not been successful. Since these two routes are in an open field where vegetation or topography is not present to assist the closure, it will require extra effort to obliterate these routes. Also see Response 3-55.

Comment 3-2: The Forest Service Misinterprets the Court’s Instructions Regarding the Need to Support its Assumptions About User-Created Routes.

Response 3-2: The comment states that “the Forest Service is required to consider the degree to which opening a particular route could lead to the creation of either additional user-created routes, or the reuse or increased use of previously created routes that have been inaccessible to the public due to route closures.” And, “the Forest Service cannot possibly fulfill this obligation without an accurate inventory of existing user-created routes on the Forest.” See Response 3-1 concerning the inventory of unmapped travel features which include user-created routes.

Secondly, the comment indicates that it is necessary “to determine the degree to which a user-created route might be created or continue to receive use.” The DSEIS discloses in a number of sections how each specialist responded to this issue.

In the Soil (pg. 4-6) and Vegetation (pg. 4-13) sections, GIS was used to map “High Risk Areas” specifically used to disclose the degree of effect caused by continued illegal motorized uses. In the Wildlife section (pg. 4-17) this GIS mapping was disclosed in the following way which clarifies how this issue was determined for the effects analysis. “Our approach is to essentially evaluate the proximity of the route alternatives to areas that may be prone to new route creation and then to determine if these areas fall within important habitats. We assumed that prone areas closer to authorized roads and motorized trails would have a higher probability of having a new route develop than an area isolated from authorized roads and trails. To determine where new routes would be likely, we assumed that flatter areas (less than 30% slope) and areas where vegetation was more sparse (shrub, forb and grasslands, and tree canopy cover less than 50%), would be more likely to have new routes develop than areas with thicker vegetation and steeper slopes.” In the Recreation section (pg. 4-40), the tactic was slightly different. The miles of UTF segments adjacent to New Open Roads, New Motor trails, and New Roads was disclosed in table 4.7.10 on pg. 4-41. This assumption is that the proximity to existing motorized routes can be used as a measure of the degree to which a user-created route might be created or continue to receive use.

Comment 3-3: The Forest Service Misinterprets the Court’s Instructions Regarding the Need to Identify the Cumulative Impacts Associated with the Shoshone Trail.

Response 3-3: Section 4.14.12 Cumulative Effects conclusion related to the Shoshone ATV Trail (pg. 4-43) is included in the DSEIS. This section discloses additional effects would occur

because of the designation of the Shoshone ATV trail. Specifically, there is a likelihood of increasing motorized use in an area already very popular with motorized users.

The March 7, 2012 Court Decision specifically ordered that “the Forest Service must evaluate whether its decision will have an impact upon the Shoshone Trail system”. This section of the DSEIS discloses specifically that miles of approved motorized routes change by alternative and show relatively minor cumulative effects to the overall transportation system. Future new trails adjacent to the Shoshone ATV trail would have a cumulative effect (pg. 4-44). Since most of the routes proposed on National Forest are currently a part of the Shoshone ATV trail complex, the potential future expansion to the entire proposed Shoshone ATV system of routes would not have much meaningful impact to the National Forest but do have additional cumulative effect to private lands west of the National Forest land.

Comment 3-4: It appears that none of the alternatives has been altered to reflect the legal settlement between Box Elder County and the Selman family over the status of the private portion of the Sink Hole Loop route.

Response 3-4: This DSEIS was limited to those topics directed by the Federal District Court in its March 7, 2012 order.

The Forest Service was not a part of the legal dispute between Box Elder County and the Selman family. The Forest Service route that enters the Selman property is limited to the Sink Hollow Loop road (26012). In the September 2007 ROD, (pg. ROD-14) the pending court action was indicated but only in the determination if the private roads would be considered a public road. The Court determined that the road was a Box Elder County Class D road but only open seasonally for motorized use by the public. The FEIS decision was to have a seasonal opening date of June 15th which contrasts with the Court Ordered open date of July 15th. The seasonal dates for the Sink Hollow Loop road (26012) will be changed in the Final Record of Decision to July 15 to November 15 to comply with the Court Order.

Comment 3-5: Clarify “Note ***” for Table 2.7.1 Comparison of Alternatives (Pg. 2-2). Please define what the Forest Service means by a higher level of accuracy and what that level is compared to or how the various methods compare.

Response 3-5: Note *** for Table 2.7.1 Comparison of Alternatives (Pg. 2-2) states “Unauthorized routes digitized from 2010 (9.84 inch) high resolution orthophotography. This method of identifying routes on National Forest is the preferred method because of the higher level of accuracy. Miles of Unauthorized routes do not change by Alternative because the new inventory used the 2007 data files which identified routes proposed to be included or changed to other route categories.”

The higher level of accuracy refers to alternative methods of inventorying routes in the National Forest. The inventory provided by the Remote Sensing Application Center is the starting point for the analysis of routes. In the DSEIS, section 3.2 Transportation System 3.2.2 Existing Condition, page 3-1, describes the inventory process. This includes a statistical sampling of the

features was completed during the summer of 2012 by Ranger District personnel. This field-review was an important part of the inventory process.

Comment 3-6: The assumption that the Forest Service makes here is that "Shoshone Trail" applies only to the routes already designated as such. However, the Forest Service has stated that it can apply such designations at any time, without notice or analysis.

Response 3-6: The portion of the Shoshone ATV trail in the Ogden Ranger District is a relatively small portion of the existing trail system or the conceptual expanded trail system. All routes that pass through the Ogden District to extended portions of the Shoshone ATV trail on Bureau of Land Management, State of Utah, or private land are already included in the Shoshone ATV trail system. Based on the current situation where the use of the named trail has not been a significant amount, or that a motorized ATV is currently approved to travel on any existing road in the vicinity around the Shoshone ATV trail, there is no discussion or planning to expand the named system of roads for the Shoshone ATV trail.

Comment 3-7: It is unclear what the Forest Service intends regarding the statements related to the Shoshone Trail maps.

Response 3-7: This comment is partially correct. The maps could be reprinted at any time. See comment 11-6 concerning plans to expand the Shoshone ATV trail on the Ogden Ranger District.

Comment 3-8: In the first section of this page, the Forest Service makes the statement that the "status quo as of this date shall be maintained." However, there is no explanation of what constitutes the status quo.

Response 3-8: The definition of the "Status Quo" in this case is the current status of the implementation of the changes to specific routes listed in the ROD Table 2 Summary of Specific Route Designations on pages ROD-7 to ROD-13. The Final SEIS will include Appendix F Ogden Travel Plan Implementation Status as of March 7, 2012.

Comment 3-9: What is the justification for selecting a 48-inch threshold for this analysis?

Response 3-9: The 48-inch width of a trail or unmapped travel feature in this inventory is intended to make a distinction of a motorized route created by an ATV or UTV. 48-inch is the smallest class of ATV trail in our Forest Service Trail Handbook (Exhibit 23.22). Anything visible on the air photo that is narrower than 48-inch could only be created by human or animal foot travel or a motorcycle. The amount of motorcycle travel on the Ogden Ranger District is not significant compared to the amount of ATV vehicle travel. Once the inventory using air photos was complete, then a statistical sampling of the routes was done to further clarify the routes. See DSEIS page 3-2.

Comment 3-10: What does the Forest Service mean when it states: "For all of the roads that were effectively closed, most of the routes had low vegetative recovery, very little to no erosion and no impacts to perennial streams"?

Response 3-10: As stated in DSEIS 3-2, this is a part of the Summary of Results for the field validation of the unmapped travel feature inventory. The statistical field visit sampling of the unmapped travel feature attributed each sampled routes. A determination was made by the field personnel that if the route had been physically closed to motorized travel in the past, how was the closure working? The field inspection included the relative amount of vegetative recovery, soil erosion, and its location in relation to perennial streams.

Comment 3-11: The Forest Service states that there are 6.24 miles of routes that are less than 150 feet from the system road used to access dispersed camping.

Response 3-11: These unmapped travel features were items that were determined by the Staff on the Ogden Ranger District that originated on a system road and ended at a dispersed camp. This was a category of feature that was not considered an illegal route. The policy on the Ogden Ranger District is that motorized travel off a system route for the purpose of dispersed camping is not illegal if routes are less than 150 feet in length. This staff review of every unmapped feature in the inventory was not completely documented other than to meet the goal to determine what features were categorized as “existing illegal trails” which was specifically ordered in the March 7, 2012 Court Decision.

Comment 3-12: The trail mileage in Table 3.7.2 is not accurate and the Forest Service cannot support the numbers that it puts forth in this chart. For instance, there are no maintained or marked non-motorized trails in the Curtis Creek area, let alone 30 miles of trails.

Response 3-12: In the Curtis Creek analysis area, there are twelve non-motorized system trails. They vary from 1.0 miles to 5.5 miles in length. The total mile of these trails is 27.2 miles. Calculations used to develop Table 3.7.2, Miles of Roads and Trails within the Boundary of the Ogden Ranger District, seem to have used a different GIS layer which would explain the difference of 2.8 miles from our Trail inventory.

Comment 3-13: The Forest Service’s assertion of the number of miles of non-motorized trails within the Ogden Ranger District is not based in reality. We are not aware of any signed or maintained non-motorized trails in the Mollen’s Hollow, Rock-Creek-Green Fork or Sugar Pine roadless areas.

Response 3-13: The condition of the existing trails on the Ogden Ranger District varies greatly, especially the non-motorized trails in the Monte and Curtis Creek areas. Our maintenance efforts for the last two decades have been focused on the front-range trails near Ogden and Snowbasin. This has resulted in some of the backcountry trails to deteriorate and be difficult to follow. Our condition surveys for these trails have correctly documented this deferred maintenance issue.

Comment 3-14: The Roadless Area inventory used by the Forest Service for the purposes of the DSEIS is inaccurate. The Table 3.10.2 chart, for instance, inexplicably omits the Public Grove Roadless Area.

Response 3-14: The 2003 Wasatch-Cache Forest Plan (pg. 4-145) determined that the Public Grove Hollow roadless area was originally mapped as roadless but later found to be less than the minimum 5,000 acres size requirement and is no longer considered within the roadless inventory.

Comment 3-15: Table 4.3.3 omits at least four (4) springs in the southwestern portion of the Curtis Creek area: Buck Spring, Hayes Spring, Boundary Spring and Tilda Spring.

Response 3-15: Section 4.3.5.1 Effects Common to all Alternatives on page 4-2 states that this method of analysis was from review of topography maps, aerial photography, and water rights database. Sensitive water resources are those that have perennial springs and wetlands that are greater than one acre or that support threatened, endangered or sensitive species and main perennial streams. The springs you referenced in the comment are all improved cattle impoundments that are relatively small in size, all less than 0.25 acres. The Buck Spring road, 20197, was realigned to avoid the spring as a part of the 2007 Record of Decision. Hayes Spring 26002 was not opened to motorized travel. Boundary Spring and Tilda Spring are not accessible by system roads but only motorized trails. See Response 11-18 for additional response. The FSEIS Table 4.3.3. Sensitive water resources that have high probability of access will be amended to include these four springs.

Comment 3-16: Table 4.3.3 fails to note that the proposed Box Elder ATV trail (xx34) would greatly facilitate access to Perry Reservoir and, in all likelihood, would not only lead to the resumptive use of the many unauthorized routes in the vicinity of the Reservoir, but would lead to the creation of additional user-created routes in that area.

Response 3-16: The proposed Box Elder ATV trail (xx34) is designed to turn east to the Willard Mountain Road 20084 before it would enter the Perry Reservoir basin and area. This turn east is on the flank of Black Mountain near the south end of the route. This was done to purposely avoid motorized travel into the Perry Reservoir area. We do not feel that the proposed trail would have the effect you described.

Comment 3-17: Please clarify what the reference to “Table 1” pertains to. There is no Table 1 within this section of the DSEIS.

Response 3-17: This reference should be for Table 4.3.3. Sensitive water resources that have high probability of access on page 4-2 to 4-3. This was an editing error.

Comment 3-18: If the water resources described above in the comments relating to DSEIS 4-2 to 4-3 had been included in the analysis, it is highly likely that there would be many more differences between the alternatives than outlined in the current version of the DSEIS.

Response 3-18: Our review of this comment and necessary protection of the specific springs you referenced did not result in any changes to existing alternatives presented in the FEIS. Specifically, Buck Spring road, 20197, had an alternative to move the entire road away from the pond to protect sensitive aquatic species present in the pond including the Forest Service Selected Alternative. The Hayes Spring or Tilda spring 2, 26002, was closed to motorized use in five of the six alternatives to protect the resources in that area. Boundary Spring, 26736, had a

reroute identified as Boundary spring reroute, xxx5, to move the trail from the pond impoundment to protect multiple resources. None of the Tilda Spring roads or trails actually access Tilda Spring. Tilda spring overlook, 26102, is the main Tilda area route and has a range of alternatives from non-motorized trail to the selected alternative motorized trail. We feel that the range of alternatives in response to your comment is adequate.

Comment 3-19: Please clarify what the reference to Table 1 pertains to. (2) Please expand on the explanation associated with Table 4.4.1. Please specify what constitutes the “miles” referred to in Table 4.4.1. Without these further explanations, the assertions made in that Table are unsupported.

Response 3-19: Table 1 is from the Soil Supplemental Report (taken from the EIS) and is Table 4.4.1 in the DSEIS. Table 2 references Table 4.4.2: Additional Impacts on pages 4-7 to 4-11 in the DSEIS. The miles referred to in Table 4.4.1 came from the specialist soil report in the project folder. The column titled Project Area FS only in Table 4.4.1 will be removed in the FSEIS because it does not add to this analysis subject. That specialist soil report was independent of the effects analysis done by a previous Soil Scientist and was done much earlier in the FEIS analysis. There is a statement to refer the reader to the Analysis and Comment in the FEIS Chapters 4 and 8. Otherwise, some of the routes cross non-Forest Service land which the Forest Service Soil Scientist did not have included in the analysis.

Comment 3-20: Please clarify what the references to Table 1 and Table 2 mean.

Response 3-20: Table 1 references Table 4.4.1: Miles by Alternative on page 4-6. Table 2 references Table 4.4.2: Additional Impacts on pages 4-7 to 4-11.

Comment 3-21: xxx4 (Tilda Spring 3 extension): Much of this route would follow an existing unauthorized route, so it is clear that the topography is conducive to unauthorized trail creation and further creation of unauthorized trails in this area is probable.

Response 3-21: You are correct that Tilda Spring 3 follows an unauthorized route which implies that the further creation of new routes is possible. Table 4.4.2: Additional Impacts will be modified to correct this error in the FSEIS. However, this terrain does not match the mapped criteria of topography conducive to unauthorized routes. This route is an exception to that assumption.

Comment 3-22: 26102 (Tilda Spring overlook): This route passes through several areas of meadows and low brush where off-trail travel would not be difficult. Furthermore, there are already at least four adjoining unauthorized routes that have received use in the past.

Response 3-22: You are correct that Tilda Spring overlook 26102 does pass through terrain that would make further unauthorized route possible. Table 4.4.2: Additional Impacts will be modified to correct this error.

Comment 3-23: xx13 (Dry Mitchell ATV): Given that several unauthorized branching routes developed along the Mitchell Hollow trail in the past, and that the extension is on similar terrain,

it seems clear that the topography here is conducive to unauthorized trail creation and that additional impacts from new trail creation are likely.

Response 3-23: In the Dry Mitchell ATV trail area there are not several unauthorized routes. Only one significant illegal route has been created. The ATV trail follows a single drainage for a large portion of its length where the topography limits illegal trails. However, Table 4.4.2: Additional Impacts will be modified to disclose the potential for illegal routes.

Comment 3-24: xx34 (Box Elder Creek) trail would connect to several unauthorized routes on Black Mountain, with connections to Perry Reservoir. Thus, illegal routes do already exist near the Reservoir. Moreover, this evidence shows that the Forest Service's decision would facilitate increased use of these illegal routes.

Response 3-24: The Table 4.4.2: Additional Impacts will be corrected to indicate that Illegal routes currently exist near travel route. However, since the planned Box Elder Creek ATV xx34 trail does not enter the same basin where Perry Reservoir is located, we disagree that our decision would facilitate illegal routes near Perry Reservoir. See Response 3-16.

Comment 3-25: 26010 (Dock Flat to Perry Reservoir): This trail seems to partially coincide with xx34, so the preceding comments apply. In addition, there are quite a few existing illegal routes that connect to this route north of its junction with 26022. Much of the topography here is conducive to unauthorized trail creation and additional impacts from new trail creation are likely, in addition to increased use of existing authorized routes.

Response 3-25: The Table 4.4.2: Additional Impacts will be corrected to indicate that Illegal routes currently exist near the travel route.

Comment 3-26: 26022 (Pete's Hollow trail): This route connects to existing illegal routes in at least four locations on National Forest land, and makes further connections on state lands that loop back onto National Forest. While much of the surrounding topography is not conducive to new unauthorized trail creation, this extremely steep trail would attract aggressive riders who would be quite capable of creating new unauthorized trails in this area.

Response 3-26: The Table 4.4.2: Additional Impacts will be corrected to indicate that Illegal routes currently exist near travel route.

Comment 3-27: There is an apparent typo in the notes at the bottom of Table 4.4.2: >50% where it presumably means <50%. These criteria are inadequate, however. Even a canopy cover of 80% means that the other 20% of the area might lend itself to illegal trail creation. Furthermore, even where there is canopy cover, some wooded areas are sufficiently open that vehicles can still get through.

Response 3-27: The notes at the bottom of Table 4.4.2: Additional Impacts will be corrected to indicate that topography conducive to ATV trail creation is 1) slopes less than 30% and 2) canopy cover is <50%. We disagree that this criteria is inadequate. It is a professional judgment that the amount of canopy cover of over 50% would limit the ability of creating new

illegal ATV trails. We acknowledge that this criterion may not work in all conditions but is an adequate analysis measure.

Comment 3-28: Here, after "Vegetation", a "30% cover" threshold is used instead of the 50% described in the note on page 31. As just noted, even 80% cover is not sufficient to prevent unauthorized trail creation.

Response 3-28: Each specialist determined the appropriate level of cover and slope for their analysis of the limits to the ability to create new illegal ATV trails. In this case, the criterion was vegetation cover of any type rather than tree cover used by other specialists. This includes areas of shrubs and forbs or Midscale Vegetation types where illegal routes tend to only occur on open vegetation-free ground.

Comment 3-29: We dispute the claim that "[t]hrough travel management, enforcement and regular patrols, illegal OHV routes can be discovered and shut down prior to them becoming a major impact to any TES plant species."

Response 3-29: We maintain that this statement is completely correct. Controlling new illegal routes before they become major impacts to any resource makes common sense and will continue to be our travel management strategy on the Ogden Ranger District.

Comment 3-30: Experience has shown that the Ogden Ranger District staff lack either the resources or the will to shut down many of the long-existing illegal routes in the district.

Response 3-30: The Ogden Ranger District will continue to prioritize resources to manage motorized travel in this jurisdictional unit. We maintain the effort to complete this Environmental Impact Statement shows the commitment to motorized travel management.

Comment 3-31: We dispute the claim that "[t]hrough travel management, enforcement and regular patrols, illegal OHV routes can be discovered and shut down prior to them becoming major vectors for noxious weed expansion." There has been no attempt to determine, on a route-by-route basis, where noxious weeds are a more serious concern and where they are less of a concern.

Response 3-31: See Response 3-29. The Ogden Ranger District has a noxious weed inventory that does show by area where known populations of invasive species occur.

Comment 3-32: We would suggest that these weeds should be considered more of a concern in remote areas, far from where highway-legal vehicles can reach, recognizing that it is more difficult to monitor these areas, to prevent illegal off-route travel, and to remove weeds from these areas after they are discovered. Therefore, to minimize noxious weed invasion via motorized travel routes (authorized and unauthorized), the authorized trails should be kept as close as possible to well-traveled roads.

Response 3-32: We understand your comment. We will consider your suggestion in our ongoing management of invasive plant species.

Comment 3-33: The 50% canopy threshold is too low. Illegal trail creation is quite common in areas with canopy cover of 80% or greater. Sometimes dense shrubs can offer a greater barrier to off-route travel than thin woodlands.

Response 3-33: Each specialist determined the appropriate level of cover and slope for their analysis of the limits to the ability to create new illegal ATV trails. See Response 3-27 concerning the professional judgment to determine the analysis criteria.

Comment 3-34: Assuming that the unauthorized routes considered are those shown on the accompanying maps, these mileages are inaccurate (generally too low, but with variations by alternative).

Response 3-34: See Response 3-1.

Comment 3-35: The Forest Service notes that "[r]outes not authorized under the alternatives would be posted closed upon discovery." This has not been true in the past. For example, on October 21, 2005, Sierra Club members toured the Public Grove 4x4 route (20220) with several Ogden Ranger District staff, and we "discovered" several illegal adjoining routes (all of which appeared to have been previously known to at least some of the staff present). To the best of our knowledge, we assert that none of these adjoining routes have been posted closed at any time since. When Sierra Club members surveyed the area on October 5, 2014, none of these routes was posted closed.

Response 3-35: Most known illegal routes beginning at the Public Grove 4x4 route 20220 have been considered in the illegal route analysis. Your Exhibit 1 examples are different and have been difficult to maintain closed. As the statement on DSEIS page 4-19 indicates, Routes not authorized under the alternatives would be posted closed upon discovery and would receive physical barrier installation when possible and when funding was available. We do prioritize how we post or close each individual route based on the situation.

However, we do maintain that the area of the National Forest referenced in your comment has seen a significant amount of travel management effort to control illegal use. In the case of your comment example, as you know, the Ogden Ranger District closed either end of the route Public Hollow Loop South 20092. Each individual illegal route behind the gate or the buck and pole fence closures was not signed because that would have been unnecessary. Nearly the entire Avon-Liberty County Road through the Public Grove area has a buck and pole fence constructed to prevent illegal travel at extensive cost and effort by the Forest Service.

Comment 3-36: Impacts to various wildlife, e.g. sage grouse and sharp-tailed grouse, are assumed to be mitigated by seasonal closures. Experience has shown, however, that seasonal closures are often not implemented on the ground.

Response 3-36: The compromise between a full-time route closure and full-time open has worked in a number of routes on the Ogden Ranger District. Nearly all of the seasonal closures

indicated in the Ogden Travel Plan begin on November 15th. This date has proven to be a challenge on years where the snow season starts early.

Your example of the seasonal closure designed to protect grouse populations on the Mantua Church Camp route xx31 needs clarification. The gate was purposely left unlocked because of the need to access the LDS Mantua Church Camp. A temporary gate you indicated in your comment was installed at the junction of the Willard Mountain road 20084. The permanent gate will be installed further east on this road at the entry to the National Forest property in Devils Gate Valley (See ROD map for the Willard & Public Grove Analysis Area). That temporary gate cannot be a legal closure since no Forest Service decision was made to close the road at that point. Because of the March 7, 2012 Court Order to maintain the Status Quo of Travel Plan project implementation, the final gate has not been installed.

Comment 3-37: It is incorrect to state that "Public Grove and Willard are closed during the winter." Snowmobiles regularly access both areas via the Liberty-Avon road and the Willard Basin road. During the spring, ATVs also access these areas by traveling over packed snow.

Response 3-37: This mention in the DSEIS referred to wheel to ground motorized vehicle access. The Willard Mountain road 20084 is closed on private land north of the Forest Service property boundary by Box Elder County. Another pair of gates closes the Avon-Liberty road each winter on the north and south ends. These gates do close the Public Grove and Willard during the winter to wheel to ground motorized vehicles. Any ATV use behind closed gates are illegal.

Comment 3-38: The text does not indicate which alternative applies to this map, but it does not appear to be the preferred alternative. In order to understand how the impacts to elk habitat vary by alternative, and hence to choose among the alternatives, the analysis must be carried out separately for each alternative.

Response 3-38: The text in this section that discusses alternatives in the analysis is intended to be general and relative, not specific to any one alternative. The miles of inventoried unmapped travel features do not vary by alternative as illustrated in Table 1a, Comparison of proposed treatments for alternatives 1, 2, 3, 3a, 4 and 5 on DSEIS page Intro-3. The analysis of the effects from unauthorized routes by alternative on year-round elk habitat was completed. See on page 4-19 Table 4.6.13, Number and miles of unauthorized routes that would be within access distance by alternative.

Comment 3-39: Furthermore, it is not appropriate to treat all existing unauthorized routes as accessible in every alternative. The analysis must make realistic assumptions about which unauthorized routes would actually be used under each alternative, based on how those alternatives would affect or facilitate the access to those routes.

Response 3-39: The Forest Service is required to consider the degree to which opening a particular route could lead to the creation of either additional user-created routes, or the reuse or increased use of previously created routes that have been inaccessible to the public due to route

closures. See Response 3-2 and 11-28 indicating the analysis tactics used to determine likely continued access and creation of illegal routes.

Comment 3-40: The Forest Service notes that "[t]he effects from unauthorized routes are therefore moderate under the preferred alternative (alternative 5) and are intermediate compared to other alternatives." This conclusion is inappropriately vague. The degree to which the alternatives differ is not at all clear from this analysis, so no rational or well-informed decision can be reached.

Response 3-40: Since the miles of illegal routes do not vary by alternative as shown in Table 1a, Comparison of proposed treatments for alternatives 1, 2, 3, 3a, 4 and 5 on page Intro-3, the determination of the relative effects by alternative to Elk must include the final decisions by route in the Record of Decision.

Comment 3-41: A more careful analysis, though, would clearly show (for example) that the Mollen's Hollow patch would be significantly revitalized by closing the ATV trails (Tilda Spring, etc.) in the southern portion of this patch, and hence cutting off access to the adjoining unauthorized routes.

Response 3-41: The discussion in the DSEIS for elk on page 4-28 indicated that unauthorized routes which penetrate far into the patches have a more pronounced effect than those that only penetrate a short distance. Our analysis of the Mollen's Hollow patch is an example of this point. The bulk of the Mollen's Hollow area, because of topography, is free of motorized impacts based on our inventory. This allows this elk patch to provide the needed habitat acres in a large portion of the National Forest which may allow us to reduce the effects on elk.

Comment 3-42: There is no analysis in the DSEIS to justify the conclusory statement that "[u]nauthorized routes are not likely a barrier to dispersal to lynx and therefore have negligible effects on the travel corridor for lynx."

Response 3-42: The bulk of the effects analysis for lynx is in the FEIS. Since lynx are currently not present but would use the Ogden Ranger District as a transportation corridor, the effects to lynx are more impacted by the Record of Decision on system roads than on the illegal route analysis found in the FSEIS.

Comment 3-43: DWR maps also show a patch of sage grouse habitat in the Public Grove area. Even if sage grouse have been extirpated from this patch, it is still historical habitat and, hence, potential habitat that should be preserved and enhanced. Unauthorized routes pass through this area, and access to those routes varies significantly by alternative.

Response 3-43: The alternatives in the 2007 FEIS illustrate the Forest Service preference to limit and preserve the natural resources, including grouse habitat, in the Willard and Public Grove area. New motorized trails proposed by various groups including the environmental community were not carried forward to the Selected Alternative in the ROD. The status of sage grouse in the Public Grove area is currently being determined.

Comment 3-44: This section on impacts to recreation contains very little explicit discussion of impacts, and that discussion is entirely about impacts to motorized recreation.

Response 3-44: This DSEIS is intended to meet the March 7, 2012 Court Decision to disclose the effects from illegal motorized routes. The effects to non-motorized recreation is found in the FEIS section 4.7 Effects on Recreation.

Comment 3-45: The important point here is that many closed or less accessible unauthorized routes can potentially be used as or converted to official non-motorized trails. The DSEIS should include a careful analysis of how non-motorized trail recreation opportunities would vary by alternative, based on those trails that actually exist on the ground--not what is arbitrarily labeled a non-motorized trail in the Forest Service database.

Response 3-45: This analysis and associated decision is specifically intended to be about motorized recreation. The Ranger District staff reviewed all the inventoried unmapped features as a part of this analysis. We identified 17.05 miles of routes that we currently managed as non-motorized trails but did not find any additional routes that we felt should be a future non-motorized trail.

Comment 3-46: The trail system in the Box Elder Creek area, including some of the "unauthorized routes," has been functioning effectively as a non-motorized trail system ever since the fences in the Dock Flat area were constructed in late 2003. This area seems to be especially popular for hunting (on foot) and horseback riding; the Sierra Club has also sponsored several public hikes in the area. These opportunities for quiet recreation would be lost in the preferred alternative, because motorists would then have access to all of the trails (authorized and unauthorized) in this area.

Response 3-46: Alternative 3a in the FEIS proposed that the Pete's Hollow trail 26022 in the area you referenced in your comment be a non-motorized trail. This decision was not carried forward to the Selected Alternative or the ROD (see page ROD-16). The Willard Mountain area is a well-known, extremely active motorized recreation area.

Comment 3-47: Assuming that these mileages are based on the UTF inventory shown on the accompanying maps, they are incorrect because that inventory is grossly incomplete. The table should be revised based on a more accurate inventory.

Response 3-47: See Response 3-1 concerning the UTF inventory.

Comment 3-48: As mentioned above, the Public Grove roadless area is omitted from the list that the Forest Service is using here, even though it is subject to the national "Roadless Rule."

Response 3-48: See Response 3-14 concerning the Roadless status of the Public Grove area.

Comment 3-49: Despite the obscure reference to the more extensive Shoshone Trail system that was planned in 2002-2003, this discussion still fails to acknowledge that by opening certain routes in the Willard and Public Grove areas, the Forest Service would (in the preferred

alternative) be completing its contribution toward the creation of a continuous motorized trail system stretching from Brigham City to Bear Lake.

Response 3-49: It is correct that the Pete's Hollow Motorcycle trail and Public Grove ATV trail are included in the April 5, 2002 James V. Hansen Shoshone National Trail proposal map. However, since the Pete's Hollow Trail was decided to be a Motorcycle Only trail rather than an ATV trail, that trail is not the same kind of motorized trail needed to implement the Shoshone ATV trail.

Comment 3-50: The DSEIS Fails to Apply the Minimization Standards Outlined in Executive Orders 11644 and 11989.

Response 3-50: The Forest Service has considered your comment and found that it is not related to the court-identified deficiencies. The new criteria for designating routes to minimizing environmental impacts caused by motorized recreation activities was included in section "1.3.2.5 Code of Federal Regulations" on page 1-10 10 in the Ogden Travel Plan FEIS. All of the listed criteria were included in the determination of routes in the Ogden Travel Plan analysis.

Comment 3-51: The Executive Orders call for analysis that determines if "considerable adverse effects" are present for a specific route. However, the DSEIS contains no mention whatsoever of the minimization criteria from the Executive Orders, and no evidence that the information collected on cumulative effects is being used to address and fulfill these minimization obligations. For specific routes, the Forest Service does not comply with the requirement to identify those routes and uses that lead to considerable adverse effects.

Response 3-51: The Forest Service has considered your comment and found that it is not related to the court-identified deficiencies. We have complied with the minimization criteria for Executive Orders 11644 and 11989 in our Travel Plan analysis. FEIS section 3.2 Transportation Systems on page FEIS 3-2 to 3-3 references the Road Analysis for the Ogden Ranger District cited in the FEIS on page 7-7. The Road Analysis is a road-by-road determination of the effects to the environment from specific routes. In addition, the Wasatch-Cache National Forest conducted a Road Analysis for the higher standard roads on each Ranger District including the Ogden District.

Comment 3-52: The DSEIS Fails to Comply With the Requirements of Subpart A of the Travel Management Rule as Directed by the Forest Service Washington Office. Travel Management Rule (36 C.F.R. 212.5(b)), which requires each national forest and grassland to complete a science-based analysis to: (1) Identify the minimum road system needed for safe and efficient travel and for the protection, management, and use of National Forest System lands; and (2) Identify roads that are no longer needed to meet forest resource management objectives and therefore should be decommissioned or considered for other uses.

Response 3-52: The Revised Ogden Travel Plan Purpose and Need on page 1-2 of the FEIS specifically describes that the purpose of the proposed action is to provide the public a safe and reliable system of roads and motorized trails that provide for quality motorized recreation and motorized administrative access for agency personnel and permittee's while providing for

healthy wildlife habitat, vegetation, stable soils, and high quality water. To achieve this Purpose and Need, it does require that the Forest Service identify a road system and describe how it would be administratively managed including those routes that are no longer needed and decommissioned. The Selected Alternative 5 in the DSEIS page intro-3 identifies 50 miles of routes to be closed to public use and will be removed from the road management system.

Comment 3-53: The Forest Service Fails to Address its Roadless Rule Obligations. Under the Roadless Rule, then, user-created routes over 50 inches wide are not permitted in inventoried roadless areas. This is because these unauthorized routes are not “designated and managed as [] trail[s].”

Response 3-53: The Forest Service has considered your comment and found that it is not related to the court-identified deficiencies. The Court held that the record of decision and FSEIS had deficiencies in reference to unauthorized routes. It failed to provide notice of available support for the public to understand the information cataloguing illegal routes and it failed to adequately support its assumptions about the impact of illegal user-created routes. The DSEIS analysis included the study of every known illegal route to determine if any of the inventoried routes would be managed as a system route. The result of the analysis was that none of the illegal routes met the purpose and need to be added to the system of roads and trails especially the designation of a system road which would violate the roadless Conservation rule.

Comment 3-54: Thus, in the DSEIS, the Forest Service must address the authorization of any motorized trail in an inventoried roadless area in light of the Roadless Rule. As it is almost certain that any road nearby and trail through an inventory roadless area will lead to illegal “roads” of 50 inches or more in that roadless area, the Forest Service must consider and adopt an alternative that complies with the law and refrains from authorizing any motorized trails in inventoried roadless areas.

Response 3-54: The Forest Service has considered your comment and found that it is not related to the court-identified deficiencies. The Roadless Conservation Rule would allow motorized trails. Nothing in the rule was intended to prohibit the authorized construction, reconstruction, or maintenance of motorized or non-motorized trails that are classified and managed as trails pursuant to existing statutory and regulatory authority and agency direction (FSM 2350). FSH 2309.18 chapter 20 lists the dimensions of a motorized trail width as between 48” and 72”. By definition in the Forest Service Manual, a route over 50” in width may be managed as a system trail. The Comment 3-54 is incorrect in the interpretation of existing route management standards.

Comment 3-55: Comparing the UTF inventory to Google Earth imagery. Shown below (Exhibit 1) is a small excerpt from the DSEIS map, showing a portion of the Public Grove area around the point where Weber, Cache, and Box Elder counties meet. Below the map is a Google Earth screen capture of the same area. For reference, notice the stock pond near the center of both images.

Response 3-55: The small portion of the Ogden Ranger District you have included in your Exhibit 1 is not similar to other areas on the Ranger District in the context of motorized

recreation. The referenced route south of the Public Grove ATV trail 20220 is a hill climb through shrub and grass. The first 0.15 miles have been physically closed and restored however we continue to have illegal use. The route to the north is a route that predated the property ownership by the Forest Service. At the beginning of the Ogden Travel Plan analysis in 2003, this route was determined to not be compatible with the designation of system motorized roads or trails on this National Forest. The 2003 Wasatch-Cache Forest plan Standard 19 on page 4-46 states that if the only access to National Forest requires crossing private land where public access is restricted, the adjacent National Forest land will be closed to motorized and mechanized use without a permit authorizing motorized use. In other words, routes that enter or leave National Forest property and no public easement exists, the route will be closed to motorized use. Therefore, this route was not considered in any of the alternatives to be a system road or trail. Since this route is through shrub and grass and was a minor road at one time, it has been difficult to eliminate.

Comment 3-56: Comparing inventories of unmapped and user-created routes. The illustration below shows an excerpt from the DSEIS map (left), compared to a map of the Sierra Club's on-the-ground route inventory of motorized travel routes in the same area (right), conducted in 2002-2004.

Response 3-56: It appears from your map examples that all of the major and significant routes are present in our version. The minor side routes are present on the ground but nearly all have been closed and restored as a part of our on-going annual travel management work. See Response 3-1. There are additional UTF routes on the complete inventory, some of which are on your map example.

Comment 3-57: Several of the discrepancies have no apparent explanation: the unmapped routes are clearly visible on both recent and historic aerial photos, and they still exist on the ground, so they should have been included in the DSEIS inventory.

Response 3-57: See Response 3-1.

Comment 3-58: Some routes and route segments are hidden on aerial photos by forest canopy, so they can be found only by visiting the sites. This is an inherent drawback in relying on aerial photos.

Response 3-58: See Response 3-1.

Comment 3-59: In some locations (here and elsewhere in the district) it appears that the DSEIS inventory has deliberately omitted routes that are drawn as single-dashed or double-dashed lines on the 1:24,000 scale topographic quadrangle maps. While in a sense these are not "unmapped" travel features, they are still unofficial routes that are used (when accessible) by motorists. Thus, these must be included in the DSEIS description of the existing condition and the analysis of impacts.

Response 3-59: The FEIS Chapter 4 Existing Condition is our complete record of infrastructure and conditions on the Ranger District. This Supplemental to that EIS includes the additional

inventory of illegal and unauthorized routes digitized from 2010 (9.84 inch) high resolution orthophotography. We still maintain that this method of identifying routes on National Forest is the preferred method because of the higher level of accuracy. During this inventory and analysis, not routes were purposely omitted.

Comment 3-60: A small number of the routes shown on the map at right are narrower than the 48-inch threshold that the Forest Service nominally used for its inventory. However, because the DSEIS is intended to analyze the impacts of motorcycles and motorcycle trails, the 48-inch threshold is not appropriate.

Response 3-60: We agree that it is possible to miss those routes that are physically smaller in size. The overall analysis of routes created by four-wheeled ATVs is by far the greatest amount of illegal routes and will meet the intent of the Court Ordered reviews.

Comment 3-61: The DSEIS inventory is inconsistent in its depiction of routes that cross onto non-Forest lands, while the Sierra Club's inventory is more comprehensive in this regard. It is necessary to include these routes and route segments when they provide access, across unmanaged boundaries, to other route segments that do lie on Forest lands.

Response 3-61: This Environmental Analysis is primarily focused on management of the Forest Service jurisdictions only. We have reviewed your photo documentation included in your comment but have concluded that the additional information on smaller routes is not necessary to meet the intent of our Court Ordered analysis.

Comment 3-62: This particular area is somewhat unusual in that it was physically closed to vehicle entry (by fences and gates) in late 2003, and conditions have gradually changed since that time. In many locations, the dirt surfaces of the routes are now partially or entirely covered with grass and other small plants. We have repeatedly found fresh motorcycle tracks throughout the area, so some motorized use continues to occur, but the use level is much less than before the new fences were constructed. However, we have carefully verified that these changes do not materially affect the visibility of the routes on aerial photographs: a grass-covered route is just as visible as a dirt track, because there has not been time (or opportunity) for natural vegetation to completely reclaim the routes. Thus, the many omissions from the DSEIS inventory remain a mystery.

Response 3-62: See Response 3-1. It is likely that the routes you have described were left out of the analysis for the very reasons you note in your comment. Routes that were physically closed in the recent past were given an attribute in the electronic GIS data that was not used in the effects analysis. We feel that in most situations the closure has eliminated or significantly reduced continued illegal use.

Commenter 4: United States Environmental Protection Agency
Received: Letter dated October 23 received via email October 27, 2014

Comment 4-1: Impacts to air quality are not analyzed in the Draft SEIS (including the previous documents it supplements). According to the 2006 Final EIS/ROD, the Forest Service determined that air quality was not a significant issue. The 2006 Final EIS/ROD justifies this conclusion by noting that the Ogden Ranger District “meets National Ambient Air Quality Standards (NAAQS)” and by a qualitative discussion noting that exhaust and dust emissions from off-road vehicle (ORV) use are “normally dispersed within minutes after the vehicles pass.” The 2007 Final EIS/ROD does not update these sections, but adds an air quality cumulative impacts discussion that concludes that air quality is not anticipated to be a cumulative effects issue.

While the disclosure of existing conditions and brief qualitative analysis for air quality impacts may have been accurate and appropriate at the time of the 2007 ROD, these statements regarding air quality are no longer accurate. In 2009, after issuance of the 2007 ROD, the EPA designated two areas in the vicinity of the Ogden Ranger District as nonattainment for the 2006 24-hour fine particulate matter (PM_{2.5}) NAAQS. (See 74 FR 58688, November 13, 2009). Specifically, the following nonattainment areas overlap portions of the Ogden Ranger District:

- Salt Lake City UT 24-hour PM_{2.5} Nonattainment Area, which includes Salt Lake and Davis Counties and portions of Box Elder, Tooele, and Weber Counties; and
- Logan, UT-ID 24-hour PM_{2.5} Nonattainment Area, which includes portions of Cache County.

In addition, the Salt Lake City, UT maintenance area for the 1997 8-hour ozone NAAQS (formerly designated as nonattainment for the revoked 1-hour ozone NAAQS), which includes Davis and Salt Lake Counties, overlaps portions of the Ogden Ranger District.

Although the court did not specifically direct the Forest Service to reconsider air quality, the EPA’s post-2007 ROD designation of the 24-hour PM_{2.5} nonattainment areas and the information supporting the designation (including monitoring and meteorological data) are, in our view, significant new circumstances and information bearing on the proposed action and its impacts, given the relation of air quality and the potential increases or changes in ORV use.

We recommend that the existing conditions discussion for air quality (Section 3.12) be revised in the Final SEIS to disclose the existence of these nonattainment and maintenance areas. Further, because ORV use can result in exhaust and dust emissions that contribute to ambient particulate matter concentrations, we recommend that an air quality impacts analysis be included in the Final SEIS in order to disclose whether travel management plan activities could impact air quality within the project area and in the areas designated as not meeting the NAAQS. This would require updating the discussion on environmental effects (Section 4.12) and cumulative effects (4.14.12).

Response 4-1: The draft SEIS responds to the March 7, 2012 U.S. District Court order instructing the Forest Service to address three deficiencies.

As concluded by the court, “the Forest Service is not required to further consider the environmental impact of the designation of the Shoshone Trail, the potential for further expansion of the Shoshone Trail, or the potential cumulative impacts of dispersed camping. Additionally, the Forest Service evaluated an adequate array of alternatives, and should not be compelled to consider...proposed possibilities, some of which would contradict the Forest Plan” (U.S. District Court order, page 25).

Because the draft SEIS was developed to respond directly to the court-identified deficiencies and because the court instructed the Forest Service to maintain the status quo as of the date of the court order until the original EIS is amended to address the deficiencies, the Forest Service considered only substantive public comments directly related to the three deficiencies.

The Forest Service has considered your comment and found that it is not related to the court-identified deficiencies.

Air quality was identified as a non-significant issue in Table 1.6.2 – Public Comments Not Addressed in this Analysis. The Ogden Travel Plan focuses on summer season motorized travel routes; dust created by use on classified routes dissipates quickly after vehicle passage. A very limited discussion is presented in Section 3.12 – Air Quality and Section 4.14.12 – Cumulative Effects on Air Quality.

Comment 4-2: It is our understanding that the Forest Service will either re-issue the ROD or issue a revised ROD after taking into account the information and analysis in the SEIS. The EPA notes that at this point in time, the federal action of re-issuing the ROD or issuing a revised ROD will trigger the general conformity provisions for nonattainment and maintenance areas as provided in 40 CFR 93 Subpart B.

Section 176(c)(4) of the CAA established the general conformity provision, which play an important role in helping states and tribes improve air quality in those areas that do not meet a NAAQS. In response to section 176(c)(4) of the CAA, the EPA promulgated General Conformity requirements in 40 CFR part 93, Subpart B – “Determining Conformity of General Federal Actions to State or Federal Implementation Plans,” which includes sections 40 CFR 93.150 through 93.165. Essentially, under the general conformity requirements, federal agencies must work with state, tribal and local governments in a nonattainment or maintenance area to ensure that federal actions conform to the air quality attainment or maintenance plans that have been approved by the EPA into the applicable state or tribal implementation plan. We note that for this project area, Utah’s approved State Implementation Plan (SIP) governs general

conformity requirements. Utah Administrative Code R307-115-1, as approved into the SIP, incorporate by reference the federal rules in 40 CFR part 93, Subpart B. (See 73 FR 51222, September 2, 2008).

We therefore recommend that the Final SEIS also address general conformity with respect to the Utah SIP. Although a general conformity analysis or conformity determination (as appropriate) is not required to be completed concurrent with the NEPA process. We recommend that consideration be given for doing so for purposes of efficiency. We note, however, a general conformity analysis or conformity determination (as appropriate) must be completed no later than the re-issuance of the ROD or issuance of a revised ROD. If the Forest Service chooses to address general conformity separately from the NEPA process, we recommend that the Final SEIS include a discussion regarding general conformity and how the Forest Service intends to address it. We are available to discuss the general conformity rule and options to address the rule's requirements with you if that would be useful.

Response 4-2: Air quality in the state of Utah is governed by a series of federal, state, and local laws. These laws are designed to ensure that air quality in the state is in compliance with the Clean Air Act of 1970. The Environmental Protection Agency ("EPA") Office of Air Quality Planning and Standards has set National Ambient Air Quality Standards ("NAAQS") for six principal pollutants (carbon monoxide (CO), lead, nitrogen dioxide, particulate matter ("PM" less than 10 microns in diameter or less than 2.5 microns in diameter), ozone, and sulfur dioxide), which are called "criteria" pollutants. Units of measure for the standards are parts per million (ppm) by volume, milligrams per cubic meter of air, and micrograms per cubic meter of air ($\mu\text{g}/\text{m}^3$). These standards (1) identify a chemical compound, (2) describe a time period for measurement, and (3) define a maximum concentration.

States must have an EPA-approved State Implementation Plan ("SIP") in place in order to improve air quality in designated nonattainment and maintenance areas for the six criteria pollutants. Nonattainment means any area that does not meet (or that contributes to ambient air quality in a nearby area that does not meet) the national primary or secondary ambient air quality standard for the pollutant. The current state of Utah SIP (Updated 2013) identifies the following areas for criteria pollutants that overlay the Ogden Travel Plan project area:

- Logan Nonattainment Boundary for $\text{PM}_{2.5}$ (Cache County)
- Salt Lake City Nonattainment Boundary for $\text{PM}_{2.5}$ (includes Box Elder County and Weber County)
- Ogden Maintenance Area Boundary for CO (Weber County)

In accordance with the Clean Air Act, the EPA promulgated General Conformity Requirements (40 CFR Part 93) to ensure that federal actions comply with the NAAQS. In order to meet the requirement, a Federal agency must demonstrate that every action it undertakes, approves,

permits, or supports will conform to the appropriate SIP. Currently, the General Conformity Requirement applies to federal actions that are taken in designated nonattainment or maintenance areas. In order to limit the need to conduct conformity determinations for actions with minimal emission increases, the EPA created de minimis emission levels (calculated per calendar year) for each criteria pollutant. When the total direct and indirect emissions from the project are below the de minimis levels, the project is not subject to a conformity determination. The current de minimis emission levels for those pollutants identified within the Utah SIP and that overlay Ogden Travel Plan project area are presented in the table below.

Pollutant	Area Type	Tons/Year
PM _{2.5} Direct emissions, SO ₂ , NO _x (unless determined not to be a significant precursor), VOCs or ammonia (if determined to be significant precursors)	All nonattainment and maintenance	100
Carbon Monoxide	All nonattainment and maintenance	100

Criteria Pollutants

Particulate matter pollution (“PM”) is the term for a mixture of solid particles and liquid droplets found in the air. Some particles, such as dust, dirt, soot, or smoke, are large enough to be seen with the naked eye. Others are so small they can only be detected using a microscope. There are two types of fine particulates: primary and secondary. Both categories of PM_{2.5} are the products of all types of combustion activities (vehicles, wood burning, industrial processes, etc.). Primary PM_{2.5} is emitted directly from a source (e.g., tailpipes of motor vehicles, soot on roadways). Secondary particulates form when precursor emissions (such as sulfur dioxide (SO₂), nitrogen oxides (NO_x), volatile organic compounds (VOCs), and ammonia) react in the atmosphere to create PM_{2.5}.

Air quality is affected by both the amount and location of pollutant emissions and by meteorological conditions that influence movement and dispersal of pollutants. Atmospheric condition, such as wind speed, wind direction, and air temperature gradients, along with local topography, provide the link between air pollutant emission and air quality. Air pollution generally refers to additional chemical compounds, gases, and particulates that may have been added to the air. Pollutant sources can be from vegetation or human caused. Pollution can also be classified as to the category of emission source. The two major categories of emissions are mobile sources and stationary sources. Mobile sources include on-road automobiles and trucks, OHVs, aircraft, trains, construction equipment, and recreational vehicles. Stationary sources include point sources such as larch stack emissions from industrial sources and power generation, and area sources which represent an accumulation of many small point sources over a larger area.

Surface temperature inversions play a major role in air quality, especially during the winter when these inversions are the strongest. The warm air above the cooler air acts like a lid, suppressing vertical mixing and trapping the cooler air at the surface. As pollutants from vehicles, fireplaces, and industry are emitted into the air, the inversion traps these pollutants near the ground, leading to poor air quality. The strength and duration of the inversion will control air pollution levels near the ground. A strong inversion will confine pollutants to a shallow vertical layer, leading to elevated PM_{2.5} concentration levels while a weak inversion will lead to lower PM_{2.5} concentration levels.

The concentration and type of PM_{2.5} pollution is very similar in the Wasatch Front and Cache County (specifically Cache Valley). Both regions share similar characteristics including valley-mountain topography, strong winter-time temperature inversions, and a type of PM_{2.5} that is formed when gaseous pollution reacts in the air to form particles. The sources and mixes of gaseous pollution in both regions are similar enough that the dominant chemistry pathways are the same.

There are, however, two major differences between the Cache County and the Wasatch front. The first difference is that the Cache County (Cache Valley) is entirely enclosed by mountains, resulting in stronger and more persistent temperature inversions compared to the Wasatch Front. Secondly, the Wasatch front has many more people and more large industry pollution sources compared to the Cache Valley. The Cache Valley features smaller commercial and agricultural pollution sources.

Vehicles and urban “area sources” along the Wasatch front contribute the largest proportion of the emissions responsible for the formation of fine particulates. Sources that emit PM_{2.5} include fuel combustion from vehicles, wood burning, and industrial processes as well as vapor releases from industrial sources, paints, solvents, and coating. Vehicles contribute over half of the emissions that lead to the formation of PM_{2.5} during winter inversions.

The Wasatch front valleys and wintertime temperature inversions provide ideal conditions for the formation of fine particulates, or PM_{2.5}. These inversions generally occur between December and February, typically following a snowstorm. Concentrations of PM_{2.5} build as temperature inversions persist. Utah’s unique geography and weather, when combined with emissions, creates unusual chemical and photochemical conditions that lead to the formation of PM_{2.5}. Along the Wasatch front, anywhere from 60%-85% of all PM_{2.5} is created by secondary particulate formation.

During summer months, prevailing winds in the Wasatch front shift over the course of a day. Night and early morning winds blow from the land towards the Great Salt Lake and this trend

reverses as the day progresses. This diurnal wind pattern is typical of the Wasatch front due in large part from the mountainous terrain and large water bodies along the Wasatch front. Winds generally flow out over the lake during the night and early morning hours as the land cools off more quickly than the surface of the lake. This process is reversed during the afternoon and evening hours when the lake surface is cooler than the surface of the land.

Carbon monoxide (CO) is a colorless and odorless gas formed by the incomplete combustion of carbon-based fuel (i.e., gasoline, natural gas, coal, oil, etc.). Carbon monoxide is primarily produced from on-road motor vehicle emissions. Other significant sources of CO emissions are wood burning stoves and fireplaces. The remaining emissions come from industrial facilities, construction equipment, miscellaneous mobile sources and other types of space heating.

Because motor vehicle emissions are the major source of CO, the highest concentrations occur during morning and evening rush hours near high-traffic areas. The worst problems occur when there are large numbers of slow-moving vehicles in large parking lots, busy intersections, and traffic jams. In Utah, areas of elevated CO concentrations were always found near roadways.

Carbon monoxide problems are greater in winter due to several factors: cold weather makes motor vehicles run less efficiently, wood burning and other space heating takes place in the winter, and cold weather temperature inversions trap CO near the ground.

Air Quality Standards for PM_{2.5} and Carbon Monoxide

The Utah Department of Environmental Quality – Division of Air Quality (“DAQ”) is responsible for ensuring that the air in Utah meets standards established under the Clean Air Act and is required to ensure compliance with the NAAQS. Fine particulates are subject to two standards: a 24-hour standard and an annual standard. The DAQ monitors air quality through a network of monitoring stations and then reports concentrations of PM_{2.5} and CO to the EPA.

Generally speaking, emissions for criteria pollutants either stayed the same or continued their downward trends in 2013. However, that was not the case for PM_{2.5}. The increased measurements were the result of several uncontrollable meteorological conditions, which culminated in several strong long-lasting temperature inversions in January and February and an earlier than normal inversion season, which started in late November and continued through December. Utah meets the annual standard for PM_{2.5} in all areas of the state. Parts of Cache, Box Elder, and Weber counties exceed the 24-hour standard at times during the winter.

Expected Emissions

The Ogden Travel Plan project represents a reduction in the number of designated routes; this is considered consistent with the local Utah SIP strategy for PM_{2.5} and CO which recognizes that

mobile source emission reductions will be achieved by implementing land use policies that reduce vehicle miles traveled.

Vehicle emissions in the project area are most concentrated along federal and state highways. The Ogden Ranger District does not have jurisdiction on vehicle use levels or emissions in any of these concentrated motorized areas. Recreational motorized uses and emissions in the project area are more localized to roads and motorized trails, with generally sufficient wind dispersion to avoid air quality concerns. Moreover, the vast majority of the project area is located outside of the designated nonattainment and maintenance zones. In general, air quality conditions in the majority of the project area are very good and there are no violations of the NAAQS.

The direct effects to air quality by motorized route systems result from the relationship of motorized uses that occur on native surface routes. While the project does not propose a change in the levels of use, it will result in a change in the location, timing, and acres available for use that is not anticipated to impact air quality. Fewer miles and fewer acres of roads and trails are open for motorized use. The Forest Service does not anticipate a significant change – either increase or decrease – in the amount of vehicle use. It is expected that the same amount of motorized use would occur across the project area, with users increasing their activities on the remaining open routes.

Vehicle travel on unpaved routes generally produces fugitive dust that increases concentrations of fine particulate matter in the air. The potential amount of dust from unpaved routes would depend on the condition of the route, traffic volume, size and speed of the vehicle, weather conditions (wind, moisture), and soil types. The amount of dust generated varies greatly, depending on the qualities and properties of the soils. Soils that are highly prone to fugitive dust were identified and analyzed in the Ogden Travel Plan using soil surveys, and were avoided to the extent possible during the route designation process.

It is not expected that the selection of any of the action alternatives would degrade air quality from its current state, or have a long-term, noticeable or measureable impact on air quality. In general, air quality in the project area is good, given current motorized activities. With reductions across the project area in acres (related to motorized routes and) that have the potential to contribute to air pollution, it is expected that air quality would continue to remain good under all of the action alternatives. This project does not propose to change use levels, just the period and location of where the use may occur.

Plan components that have the highest potential to protect sensitive soils and reduce fugitive dust include: road and trail decommissioning, restricting use, and providing maintenance on designated routes in sensitive soils to minimize impacts on air quality. Allowing routes to reclaim naturally would reduce impacts on air quality over time as vegetation stabilized the soil

and creates natural barriers to vehicle travel. The action alternatives would reduce the amount of fugitive dust emitted from the project area in the long term. This would protect the air quality in the project area and reduce fugitive dust emissions contributing to the air quality in the nonattainment areas. These areas would continue to be impacted by emissions from population growth and development, agriculture, unpaved roads, and other land uses outside the project area.

The Forest Service believes the proposal will not result in a change in the amount of motorized use and therefore no change in emissions. Thus a full conformity analysis is not needed. The proposal involves only the designation of motorized recreational use as being either open to motorized use or closed to motorized use. The Forest Service is not proposing the creation of new routes, roads or trails.

This discussion constitutes the Forest Service' assessment of the proposed action and alternatives for conformity with the Clean Air Act in regard to relevant nonattainment and maintenance areas within the Ogden Travel Plan project area. The project will not inhibit the state of Utah in reaching its goals for remediating the relevant nonattainment and maintenance areas because there will be no net change in emissions from this action in any of its alternatives for the pollutants of concern.

Comment 4-3: The EPA's comments on the 2007 Final EIS (November 6, 2007) expressed concerns regarding the Forest Service's capability to enforce the proposed travel management plan. The additional information provided in the Draft SEIS supports the importance of regulating unauthorized ORV use on public land. As stated in the Draft SEIS, user-created routes generally have the greatest potential to impact watershed processes, water quality, and riparian health, because they do not have properly designed and maintained drainage features. The analysis indicates that 14 of 24 miles of new or changed route designations in the Preferred Alternative are in high-risk areas for unauthorized use. Consequently, there are many areas of potential impacts to soil resources identified in the Draft SEIS. Further, the Draft SEIS concludes, based on the closed roads survey, that roads are difficult to close, and in many situations motor vehicles will find a way to explore closed roads.

Based on these concerns we, recommend that the Final SEIS discuss how the Forest Service will commit adequate funding and personnel to regulate unauthorized ORV use. Further, we recommend that the Final SEIS include a monitoring plan for determining the effectiveness of travel management on the Ogden Ranger District, including prevention of user-created routes and success of road closures. Effectiveness monitoring is discussed in the January 2011 Council on Environmental Quality guidance on "Appropriate Use of Mitigation and Monitoring and Clarifying the Appropriate Use of Mitigated Findings of No Significant Impact" (see <http://energy.gov/nepa/council-environmental-quality>). Such a monitoring plan will support the

Ogden travel management plan by allowing the Forest Service to justify adaptation of the plan in response to any resource issues that may arise.

Response 4-3: See Response 4-1. The draft SEIS and FEIS identifies funding in section 1.6.4 – Indicators and Non-Significant Issues. Enforcement and monitoring are discussed in Section 1.3.2.3, Section 2.6, and Appendix D.

Comment 4-4: Based on our review, the EPA is rating the Draft SEIS as “Environmental Concerns – Insufficient Information” (EC-2). The “EC” rating means that the EPA’s review has identified potential impacts that should be avoided in order to fully protect the environment. The “2” rating means that the Draft SEIS does not contain sufficient information for the EPA to fully assess environmental impacts. A description of the EPA’s rating system can be found at: <http://www.epa.gov/compliance/nepa/comments/ratings.html>.

Response 4-4: Thank you for your comment. See Response 4-1, 4-2, and 4-3

Commenter 5: **Jim Trenholm**
Received: **Letter via email received September 17 and signed letter with**
 enclosures hand delivered September 17, 2014

Comment 5-1: Your September 15 letter noted “this draft SEIS was initiated in response to a March 2012 U.S. District Court order instructing the Forest Service to address deficiencies in the previous environmental analysis and the 2007 record of decision for travel plan revision on the Ogden Ranger District.” These court-identified deficiencies included the Forest Service failure to “provide notice of available support for the public to understand cataloguing illegal routes.”

How is it possible to explain illegal routes to the public when the Forest Service does not seem to understand them? If a road has existed for a long time within a so-called roadless area identified in the 2001 Roadless Rule, is the road illegal or is the roadless area illegal?

Enclosed is a copy of:

My September 17, 2013 email to former Utah Lt. Governor Greg Bell.

Long ago Dilbert cartoon w/ Q & A about roads and roadless areas.

June 29, 2011 letter to me from President Obama. Although I greatly appreciated the letter from our President, it failed to respond to my many letters concerning roadless areas and forest planning. It seems there has been no communication between regional foresters and the Secretary of Agriculture during the Harris Sherman era. Perhaps this will change with Sherman’s replacement.

My June 13, 2003 appeal of the Wasatch=Cache Revised Forest Plan. Appeal Deciding Officer Gloria Manning denied all appeals and affirmed Regional Forester Jack Troyer's decision more than one and a half years later. I later got an unsigned card in the mail stating that Assistant Under secretary David Tenny had chosen not to review the Appeal Deciding officer's decision. If you, or anyone else, receiving a copy of this letter has any questions regarding this letter and its enclosures, I will try to respond to your questions with answers.

Response 5-1: See Response 4-1. The 2001 Roadless Area Conservation Rule used criteria from earlier Forest Service roadless area evaluations. These criteria allowed the presence of some roads in areas that were evaluated for wilderness consideration. Subsequent roadless area inventories used the same criteria. In 2001, the Forest Service estimated that approximately 9,660 miles of roads existed on 5 percent of the land area in inventoried roadless areas. Some of these roads are authorized by the Forest Service, and some are not. Some of these roads pre-date the inventories. For example, some inventoried roadless areas, particularly those in the East, contained roads at the time of their inventory and timber may also have been harvested in these areas. However, the Forest Service assumes that these prior existing developments and activities did not substantially alter the areas' roadless values and characteristics, or they would not have been included in the inventory.

Because roadless was identified as a key issue, the Ogden Travel Plan FEIS and draft SEIS analyzed the effects to roadless characteristics. The Revised Forest Plan ROD (2003) also emphasized the desire to continue to manage inventoried roadless characteristics in those areas.

Commenter 6: **Jim Trenholm**
Received: **Email received September 22, 2014**

Comment 6-1: Following are more comments and enclosures relative to your September 15 letter and the draft SEIS.

President Bill Clinton, Al Gore, Dan Glickman, Jim Lyons and Mike Dombeck imposed the 2001 Roadless Rule on the American people in the final days of their administration.

In July 2003, Federal Judge Clarence Brimmer struck down 2001 Roadless Rule because it violated NPEA and the Wilderness Act.

On April 29, 2004, Roadless ruckus By Cat Urbigkit was published in the Sublette Examiner, Pinedale, Wyoming. This resulted in a May 7, 2004 letter from Wyoming Governor Dave Freudenthal thanking Jim Trenholm, Cat Urbigkit, the Sublette Examiner and Harriet Hageman for helping set the record straight. He wrote, "I write this letter to remove any doubt about my position on the Roadless Rules and Regulations and ongoing litigation on this subject." Freudenthal's letter was also published in the Sublette Examiner.

Copies of both the news article and Freudenthal's letter are enclosed. In my view, the failure of George W. Bush and his appointees to honestly address Brimmer's July, 2003 Roadless Rule

ruling and Freudenthal's April 2004 letter, setting the record straight,. was a casualty of the Iraq war.

Response 6-2: See Response 4-1 and 5-1.

Commenter 7: Capital Trail Vehicle Association
Received: Letter dated October 26 and received via emails on October 25 and 26, 2014

Comment 7-1: It does not feel to use that the Forest Service is meeting the requirements of the Multiple-Use Act and Sustained Yield Act. We would like to see documentation in the EIS on how the Forest Service feels they are meeting the requirement of the Multiple-Use Act and Sustained Yield Act.

Response 7-1: See Response 4-1. The Multiple-Use Sustained-Yield Act of 1960 (Public Law 86-517, June 12, 1960; as amended through by P.L. 104-333, December 31, 1996) provides a mandate for management priorities on the National Forests to include all resources. The law states that the national forests are established and "shall be administered for outdoor recreation" and other purposes. Motorized and non-motorized travel planning fulfills that mandate.

Comment 7-2: NEPA requires the Ogden Ranger District Travel Plan Revision Project process to address all significant issues and provide full public disclosure on those issues. A significant issue is the use of public funds for land management plans that have the purpose of removing access and use of lands from the public. To address this significant issue the EIS must adequately evaluate the following information and disclose it to the public:

- a) The cost of the EIS process cost since it was initiated in 2001 including any pre-planning costs.
- b) Total projected cost at completion of the EIS and ROD.

Response 7-2: Comment is outside the scope. Use of public funds does not meet the definition of significance as defined in 40 CFR §§1508.27.

Comment 7-3: A significant issue is the amount of public funds spent to build and maintain non-motorized trails versus the amount of public funds spent to build and maintain motorized trails. To address this significant issue the EIS must adequately evaluate the following information and disclose it to the public:

- a) Cost of closure of motorized routes following the ROD.
- b) The annual amount spent in the Uintah-Wasatch-Cache National Forest on maintenance and construction of non-motorized trails during the past 5-years.
- c) The annual amount spent in the Uintah-Wasatch-Cache National Forest on maintenance and construction of motorized trails during the past 5-years.

Response 7-3: See Response 4-1 and 7-2. Funding and costs were identified as a non-significant issue and are discussed in Section 1.6.4 – Public Comments Not addressed in this Analysis.

Comment 7-4: The lack of adequate site specific data, studies and analysis as required by NEPA continues to be a serious deficiency in the analysis that must be adequately addressed. This inadequacy includes lack of site specific studies for each route proposed for closure including wildlife studies and site-specific user data. The old standard reasons that have no factual basis include erosion (fire and floods), noxious weeds (animals and birds spread them too as much or more), etc. which can all be adequately mitigated and are no greater than natural events and conditions. The old standard reason “To provide a non-motorized experience” is not reasonable either as non-motorized recreationists have more trail opportunities and endless cross-country opportunities. Adequate consideration of the needs, historic use, and culture of motorized recreationists would result in a more balanced preferred alternative that would be far better accepted by the public. One measure that must be adequately addressed is the hours of motorized recreation lost due to the closure of OHV routes. These hours must be broken down by age class ranging from teenage visitors to senior and disabled individuals and veterans.

Response 7-4: See Response 4-1. The Ogden Travel Plan FEIS which is incorporated by reference and DRAFT SEIS describe a range of alternatives for motorized and non-motorized recreation based on the purpose and need. See Section 2.4 – Alternatives Considered in Detail. The effects of motorized use are described in Chapter 4.

Comment 7-5: The public expects a travel management process to give their historic use and need for motorized access and motorized routes a hard look. All other public agencies operate with the goal of meeting the public’s needs. There is adequate multiple-use land in the Ogden Ranger District project area to meet all of the public’s needs. No one group such as motorized recreationists need to be sacrificed.

Response 7-5: Section 1.3.1 Purpose and Need for the Proposed Project described the public need for a safe and reliable system of roads and trails that provide for quality motorized and non-motorized recreation.

Comment 7-6: The significant impacts of the proposed motorized closures on the human environment and specifically motorized recreationists has not been given a hard look in the DEIS. This continues to be a serious deficiency in the analysis that must be adequately addressed. For example, the cost in human terms can be illustrated by one of our members who has ridden 40 to 50 miles loops with his family for the past 21 years. The proposed alternatives all close significant portions of those routes used for the past 21 years. This example and the cost to the human environment will be repeated thousands of times with the level of motorized closures proposed. The hours of lost motorized recreation opportunity must be estimated in the DEIS and disclosed to the public. The DEIS must also adequately address the issue what will motorized recreationists do in place of the hours of motorized recreation lost due to the proposed closures. This evaluation must recognize the high value of time with family and friends spent on OHVs in the Ogden Ranger District travel planning area including the importance of opportunities to re-create ourselves on our OHVs. The quality of the human environment is important and be given a hard look.

Response 7-6: Effects on motorized recreation are described in Chapter 4 of the Ogden Travel Plan FEIS and draft SEIS.

Comment 7-7: Motorized recreationists including motorcycles, ATVs, and 4x4 value highly semi-primitive and primitive motorized recreational opportunities. There is a great need for these opportunities and there is a real shortage of these opportunities due to current management trends. Also, motorized recreationists like to ride on motorized trails to remote trailheads, park, and hike from there.

Response 7-7: Chapter 2 of the Ogden Travel Plan FEIS and draft SEIS describes a range of alternatives that address motorized recreational opportunities. It includes facilities for all of the types of vehicles you suggest in your comment including the opportunity to ride your vehicle on a trail, park it, and hike to scenic vistas.

Comment 7-8: There is no need for additional Wilderness for recreational usage based on the following information. Wilderness also includes all defacto Wilderness areas such as non-motorized Roadless areas and designated non-motorized areas such as proposed for the Ogden Ranger District Travel Planning area.

- a) Twenty percent of USFS trails are in Wilderness areas (Source #1 below), and these areas receive only 4% of all visitor days to USFS lands (Source #2). Routes in Wilderness areas are difficult and exceptionally expensive to maintain, due to strict management limitations (Source #3). Teams of horses and mules can move large amounts of materials but are not cost effective when compared to a pickup truck, and the maintenance equipment cannot be left on the mules overnight.
 - i. #1. United States Government Accountability Office Report GAO-13-618; Forest Service Trails; Long- and Short-Term Improvements Could Reduce Maintenance Backlog and Enhance System Sustainability; June 2013 at page 30. Complete report is available here:
<http://www.gao.gov/assets/660/655555.pdf>
 - ii. #2. USDA Forest Service; National Visitor Use Monitoring Results USDA Forest Service National Summary Report Data collected FY 2008 through FY 2012 Last updated 20 May 2013; at page 8.
 - iii. United States Government Accountability Office Report GAO-13-618; Forest Service Trails; Long- and Short Term Improvements could Reduce Maintenance Backlog and Enhance System Sustainability; June 2013 at page 30.
- b) The Government Accountability Office (GAO) recently identified that motorized users are the only ones who “pay to play” on USFS trails. And even with this funding, only 25% of all routes are financially sustainable due to high percentages of routes in Wilderness designations (Source #4). If motorized funding is not available for management of dispersed recreational opportunities, the resources available to maintain any trail greatly diminish and possible impacts expand.
 - i. #4. United States Government Accountability Office Report GAO-13-618; Forest Service Trails; Long- and Short Term Improvements could Reduce Maintenance Backlog and Enhance System Sustainability; June 2013 at page 30.

- c) The true economic driver for local economies is multiple-use recreation on public lands. USFS comparisons of user group spending profiles, made as part of the National Visitor Use Monitoring process, estimate that the motorized user spends 2 to 3 times the amount of money spent by non-motorized users (Source #5). This compounds the possibility of negative economic impacts to local communities from significantly lower levels of visitation after Wilderness designations.
 - i. #5. USDA Forest Service; White and Stynes et al; Updated Spending Profiles for National Forest Recreation Visitors by Activity November 2010 at page 6.
- d) Many Wilderness Proposals erroneously rely on the newly released Outdoor Industry Association (OIA) report that concluded that \$646 billion is annually spent on outdoor recreation. Wilderness Proposals frequently assert this was the result of quiet use recreation. This is simply incorrect, as the 2012 OIA study included motorized usage in their analysis (Source #6). Previously, versions of the OIA study attempted to only include non-motorized usage.
 - i. #6 Outdoor Industry Association; The Outdoor Recreation Economy; Take it Outside for American Jobs and a Strong Economy; 2012 report.
- e) A recent USFS report to Senator Mark Udall (D-CO) specifically stated that Wilderness Areas are a significant factor contributing to poor forest health and the outbreak of mountain pine beetle throughout the western U.S. (Source #7). This position has been repeatedly stated by the Colorado State Forest Service, which has found management restriction in Wilderness Areas have caused significant outbreaks of spruce Beetle infestations (Source #8). USFS guidelines for management and protection of watersheds identify the critical need for active management of watersheds to insure water quality (Source #9). This management is impossible in a Wilderness Area. Limited forest management is specifically identified as a major factor negatively impacting endangered species such as the Canadian lynx (Source #10).
 - i. #7. USDA Forest Service; Review of the Forest Service Response: The Bark Beetle Outbreak in Northern Colorado and Southern Wyoming; September 2011; at pages i, 5, 12. Complete report is available here: <http://www.fs.usda.gov/detail/barkbeetle/home/?cid=stelprdb5340741>
 - ii. #8. Colorado State Forest Service; 2012 Report on the Health of Colorado's forests; Forest Steward Ship through Active management; at page 5. A copy of this report is available here: <http://csfs.colostate.edu/pdfs/137233-forestreport-12-222.pdf>.
 - iii. #9 Executive Summary; PROTECTING FRONT RANGE FOREST WATERSHEDS FROM HIGH-SEVERITY WILDFIRES AN ASSESSMENT BY THE PINCHOT INSTITUTE FOR CONSERVATION FUNDED BY THE FRONT RANGE FUELS TREATMENT PARTNERSHIP. A complete copy of this report is available here: http://www.pinchot.org/pg/Colorado_watersheds
 - iv. #10 Interagency Lynx Biology Team. 2013. Canada lynx conservation assessment and strategy. 3rd edition. USDA Forest Service, USDI Fish and Wildlife Service, USDI Bureau of Land Management, and USDI National Park Service. Forest Service Publication R1-13-19, Missoula, MT. 128 pp.at page 75.

- f) The critical need for motorized access to multiple-use recreation was recently identified by the National Shooting Sports Foundation (NSSF). It found that a lack of motorized access was the largest single barrier to those wanting to hunt and fish (Source #11). A lack of multiple-use access is also identified as a significant limitation to herd management and herd health (Source #12).
 - i. #11. National Shooting Sports Foundation; Issues Related to Hunting Access in the United States; Final Report November 2010 at page 7, 13, 56.
 - ii. #12 National Shooting Sports Foundation; Issues Related to Hunting Access in the United States; Final Report November 2010 at page 11.
- g) Agency inventories and determinations on possible designations of Roadless Areas are not management decisions, but are rather inventories of characteristics of that area. Roadless areas are still governed by multiple-use management and changes to management require NEPA analysis or Congressional action. There are significant limitations on the scope of the Roadless Rule, as it only applies to new road construction or major reconstructions. Trails, even those over 50 inches wide, are not impacted by the Roadless Rule. Many areas that are involved in citizen Wilderness Proposals have been inventoried and found to be unsuitable for Roadless designation and this should weigh heavily against any suitability for Wilderness designation.

Response 7-8: Only Congress has the authority to designate additional wilderness as a unit of the National Wilderness Preservation System in accordance with the Wilderness Act of 1964. Section 1.3.1 Purpose and Need for the Proposed Project describes the public need for a safe and reliable system of roads and trails that provide for quality motorized and non-motorized recreation. Chapter 4 discloses the effects of roads and/or motorized trails on roadless values.

Comment 7-9: OHV recreationists need beginner loops near camping areas for those learning to use their machines and those not able to go on longer excursions.

Response 7-9: The ROD (2007) for the Ogden Travel Plan describes various loop trails and is incorporated by reference in the draft SEIS.

Comment 7-10: Motorized recreationists carry chainsaws and keep trails open for everybody. This is a significant point given the amount of beetle killed trees that are falling across trails. On a recent ride on the CDNST between Champion Pass and Lowland Campground, motorized recreationists had recently cleared over 100 fallen trees from the trail. On a following weekend motorized recreationists cleared over 200 fallen trees from the CDNST near Bull Ranch. Our observations indicated that if motorized recreationists are not allowed to clear the trails through their use then the trail will be largely closed by downfall within two years.

Response 7-10: See Response 4-1. Comment refers to portions of the Continental Divide National Scenic Trail within the Gila National Forest (New Mexico). This is not within the Uinta-Wasatch-Cache National Forest (Utah) planning area and therefore comment is not applicable.

Comment 7-11: The following quotation is an example of an all too common non-sharing attitude was recently published in the Great Falls Tribune. *However Monty Pirtle said he thinks there's too much motorized use already allowed in the forest. He said he doesn't want to be hiking and run into a motorcycle. "From my point of view, the forest service here is going to hell in a handbasket," said Pirtle, a former wilderness ranger in Washington. "I like bikes, but not on the (forest) trails."* <http://www.greatfallstribune.com/story/news/local/2014/06/30/public-gives-input-forest-plan/11822303/> We maintain that this sort of non-sharing attitude is not appropriate for visitor expectations on lands designated by congress for multiple-use and should not be rewarded by imposing motorized closures on multiple-use lands. Furthermore, wilderness lands are under-utilized and a more reasonable solution for individuals that feel strongly about meeting a motorcycle or ATV is to select wilderness areas for their visits.

Response 7-11: Comment is specific to management planning on the Helena and Lewis and Clark National Forests. This is not in the Uinta-Wasatch-Cache planning area and therefore comment is not pertinent.

Comment 7-12: The agencies created the wolf predation on wildlife problem by their support for the re-introduction of wolves. Motorized recreationists should not be tagged as creating that problem or having anywhere near as significant an impact on wildlife as wolves or be used as mitigation for wolf problems.

Response 7-12: The Ogden Travel Plan FEIS and draft SEIS section 3.6.2.1 and 4.6.3.1 discusses the gray wolf.

Comment 7-13: New research in Wyoming finds that mountain lions go out of their way to avoid wolves. The research conducted by the Teton Cougar Project finds that the cats In Jackson Hole spend a disproportionate amount of time in parts of their territory that are far from wolves and tend to distance themselves from wolves. The study was published in the Journal of Zoology in late May. http://trib.com/news/state-and-regional/wyoming-study-finds-cougars-avoid-wolf-territory/article_931a0a09-4d4a-59da-9c05-b8b9ab595e6c.html It is also quite likely that wolves affect other species such as grizzly bears and lynx in a similar way.

Response 7-13: Thank you for your comment. Sections 3.6 and 4.6 discuss wildlife species.

Comment 7-14: The actual zone of influence of motorized trails on wildlife is very small as demonstrated in a later comment.

Response 7-14: Impacts of motorized trails on wildlife are described in Chapter 4.

Comment 7-15: A December 31, 2003 Federal Court ruling found that associated with actions taken under the endangered species action must be paid to the public. The case stemmed from the government's efforts to protect endangered winter-run chinook salmon and threatened delta smelt between 1992 and 1994 by withholding billions of gallons from farmers in California's Kern and Tulare counties. Court of Federal Claims Senior Judge John Wiese ruled that the government's halting of water constituted a "taking" or intrusion on the farmers' private property rights. The Fifth Amendment to the Constitution prohibits the government from taking private

property without fair payment. “What the court found is that the government is certainly free to protect the fish under the Endangered Species Act, but it must pay for the water that it takes to do so,” said Roger J. Marzulla, the attorney representing the water districts that brought the claim. This same standard should also be applied to the economic and motorized recreational losses that the public has suffered under the ESA including motorized closures justified by grizzly bear habitat and impacts on westslope cutthroat trout and bull trout.
(<http://www.uswaternews.com/archives/arcrights/4caliwate2.html>)

Response 7-15: Comment is beyond the scope of this analysis. Grizzly bear, cutthroat trout, and bull trout are not located within the Uinta-Wasatch-Cache National Forest (Utah) planning area.

Comment 7-16: “Present day populations of white-tailed deer and elk are at their highest levels recorded in recent history” (Montana Wolf Conservation and Management Planning Document, Montana Fish, Wildlife and Parks, January 2000
(<http://fwp.state.mt.us/wildthings/wolf/wolfmanagement011602.pdf>). Additionally, “nearly 60 percent of Montana’s original elk management units exceed elk-population objectives, while only 31 percent exceed harvest objectives” (www.fwp.state.mt.us/hunting/elkplan.html).

Response 7-16: Comment references data on white-tailed deer and elk within the state of Montana. This is not within the Uinta-Wasatch-Cache National Forest (Utah) planning area and therefore comment does not present best available pertinent data. Wildlife are discussed within Section 3.6 and 4.6 of the Ogden Travel Plan draft SEIS and FEIS.

Comment 7-17: The number of hunters is declining (U.S. Fish and Wildlife Service, 1996 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation.
http://library.fws.gov/nat_survey1996.pdf and
http://www.cbsnews.com/stories/2007/09/03/national_printable3228893.shtml). Therefore, there are no compelling reasons “to elevate the level of elk security in the project area and...enhance elk populations” as frequently suggested by wildlife biologists (example; Fish, Wildlife and Parks letter dated February 27, 2002 to Uintah-Wasatch-Cache National Forest on the Clancy-Unionville Travel Planning Project, bottom of page 9). Additionally, there are no compelling reasons to justify reduced road densities as a sought-after or necessary wildlife management criterion. Lastly, there are reasonable alternatives including permit hunting and seasonal travel restrictions that can better accomplish the outcome sought by reduced road and trail densities. NEPA requires consideration and implementation of all reasonable alternatives. Not considering and implementing reasonable alternatives demonstrates a predisposition in the process.

Response 7-17: The Forest Service is responsible for management of wildlife habitat to provide for stable and self-sustaining wildlife populations for both game and non-game species. Section 1.3.1 Purpose and Need states the plan is needed by the public in addition to providing for wildlife habitat, vegetation, stable soils, and high water quality. The Ogden Travel Plan FEIS and draft SEIS primarily addresses motorized routes, thus the emphasis is the effects of motorized activities. A thorough discussion of the effects of all the Alternatives as related to roads and road densities is provided in the Wildlife Section 4.6 and Cumulative Effects Wildlife Section 4.14.6. Although use of OHVs for hunting is included in the estimated effects, a specific study of the effects of hunting has not been done. The Utah Division of Wildlife Resources administers

hunting permits for the state of Utah. Chapter 2 describes a range of alternatives pertaining to seasonal closures of specific routes.

Comment 7-18: Elk Cover Requirements. Elk do well in places like Nevada without trees. Additionally, elk were originally a plains animal and survived just fine without trees. Effective elk hiding is provided by mountains, hills, ravines, ridges, rocks, brush. These land factors must be incorporated into the elk hiding cover equation. Recent analysis by the Uintah-Wasatch-Cache National Forest for the Elkhorn Wildlife Management Area has demonstrated that a reasonable consideration of the topography in the area would meet the requirements for elk security. This reasonable and realistic approach to elk cover and wildlife security requirements was not applied to the Ogden Ranger District Travel Planning analysis.

Response 7-18: See Response 4-1. The affected environment and environmental consequences on elk are discussed within Section 3.6, 4.6, and 4.14. The Elkhorn Wildlife Management Area is located within the Helena National Forest (Montana). This is not within the Uinta-Wasatch-Cache National Forest (Utah) planning area and therefore comment does not present best available pertinent data.

Comment 7-19: Additionally, wolves have radically changed elk behavior and use of tree canopy. Elk now avoid tree cover because the cover allows wolves to prey upon them easier. Elk now prefer open areas where they can “keep an eye” on wolves and defend themselves. Therefore, tree cover is not a significant benefit to elk at this time and this changed condition must be recognized.

Response 7-19: See Response 7-18.

Comment 7-20: Research and documents including the following clearly demonstrate that OHV recreation has no more impact on wildlife than other forms of recreation and is in fact less in many cases (references available upon request):

- a) Chapter 6, Ungulates, Effects Of Recreation On Rocky Mountain Wildlife, A Review For Montana, 1999.
- b) A Partial Literature Review Of The Effects Of Various Human Activities On Wildlife, Compiled By Nora Hamilton, Bureau Of Land Management, National Technical Assistant For Trails, September, 1997.
- c) Ward, Lorin A., Jerry J. Cupal, “Telemetered Heart Rate of Three Elk as Affected by Activity and Human Disturbance”, Planning for Trailbike Recreation, US Department of the Interior Heritage, Conservation and recreation Service, 1976.

Response 7-20: The Ogden Travel Plan primarily addresses motorized routes, thus emphasis is the effects of motorized activities. Chapter 4 describes the effects of other activities.

Comment 7-21: The impact of OHV recreation on wildlife has been overstated by the agency and wildlife biologists. First, wildlife populations are at all time high (<http://www.mtstandard.com/articles/2005/11/30/outdoors/hjjeigjjcefjb.txt>, <http://fwp.mt.gov/FwpPaperApps/hunting/ElkPlanFinal.pdf>) at the same time when OHV use is increasing. If there is any impact to be identified, it appears that it should be that the positive

impact associated with increasing OHV use and increasing wildlife populations. Secondly, OHV use does not kill wildlife. Wildlife coexists just fine with OHVs. This was recently confirmed again by a study in Yellowstone Park which found that “Most elk, bison and trumpeter swans barely reacted last winter to the presence of snowcoaches and snowmobiles in Yellowstone National Park, according to a study released Tuesday. Scientists watched more than 2,100 interactions between over-snow vehicles and wildlife last year to try to determine how they responded. Of those, 81 percent of the animals had no apparent response or they looked and then resumed what they were doing, the study said” (http://www.Uintah-Wasatch-Cacheir.com/articles/2005/12/14/montana/a10121405_04.prt and <http://www.nps.gov/yell/parkmgmt/upload/winterrec05.pdf>).

Response 7-21: The first three references provided by the commenter could not be located. The last reference pertains to wildlife within Yellowstone National Park. This is not within the Uinta-Wasatch-Cache National Forest (Utah) planning area and therefore comment does not present best available pertinent data.

Comment 7-22: The disturbance of wildlife by OHV issue including wildlife corridors is being exaggerated to further the conversion of multiple-use lands to non-motorized lands. The agency is encouraged to avoid road and trail closures based on wildlife concerns except where negative wildlife impact can be specifically identified and documented. Motorized use on existing trails has little or no verified effect on game animal welfare. In fact, areas that have been more intensely visited by motorized visitors have experienced significant increases in wildlife populations; further substantiating the fact that motorized recreation does not create a significant impact on wildlife.

Response 7-22: Best available data and scientific literature were utilized to determine impacts of motorized use on wildlife as described in Section 4.6 and 4.14.

Comment 7-23: Wildlife managers need to change their attitudes about summer motorized recreation and elk populations and admit that the two are compatible. Managers are seen the need for a shift in thinking (http://Utah-Wasatch-Cacheir.com/articles/2009/04/26/state/top/55st_090426_elk.txt). Elk populations are healthy. The wants and needs more motorized access and recreation. There is no plausible reason that multiple-use land cannot be managed for a better balance of motorized access and recreation.

Response 7-23: The reference provided by the commenter could not be located. Thank you for your comment.

Comment 7-24: Hikers and wolves impact wildlife more than OHV use yet hikers and wolves are unrestricted.

Response 7-24: Thank you for your comment. The Purpose and Need describes the public need for a safe and reliable system of roads and trails that provide for quality motorized and non-motorized recreation. The Ogden Travel Plan primarily addresses motorized routes, thus emphasis is the effects of motorized activities. Chapter 4 describes the effects of other activities.

Comment 7-25: Some interests are pushing the wildlife corridor concept as a reason to close areas to motorized use. We have not seen adequate documentation or reasoning to justify this position and suspect that it is being used inappropriately as a reason to justify defacto wilderness by non-motorized interests. Significant issues must be answered before this concept can be given any credibility. Issues include:

- a) Why would wildlife follow physically challenging basin Ogden Ranger Districts where food and water is scarce versus other corridors? They don't. This is easily verified by open areas in the Ogden Ranger District where we have never observed any significant number of wildlife crossings versus great numbers of wildlife crossings that we have observed in other areas that are more favored by wildlife.
- b) There is no data or credible documentation that the continental Ogden Ranger District or other basin Ogden Ranger Districts are favored for wildlife migration. Especially theories that purport that wildlife will migrate from Mexico to Canada. This is counter to the types of habitat that different species require in order to survive. There is a significant lack of credible evidence to support the wildlife corridor hypothesis.
- c) The lack of authorization or mandate from congress for this sort of designation and use of public land.
- d) The socio-economic issues associated with the attempt to use the wildlife corridor concept to convert multiple-use lands to defacto wilderness.

Response 7-25: Regional wildlife corridors and roadless were identified as key issues and discussed in Alternative development. See Chapter 1 and 2 of the FEIS and draft SEIS. Section 3.6.1 states that "the Ogden Ranger District is located within a portion of a wildlife corridor, which has regional importance in providing linkage to other larger habitat areas." Section 3.6 and Section 4.6 utilizes many sources of literature and information to support its analysis. Because roadless was identified as a key issue the Ogden Travel Plan FEIS and draft SEIS analyzed the effects to roadless characteristics. The Revised Forest Plan also emphasized the desire to continue to manage inventoried roadless characteristics in those areas. Economic impacts were discussed in Chapter 3. The analysis in the FEIS and DSIES is limited to significant issues and economics was not considered.

Comment 7-26: A study of sound levels from OHV use was found to be less than the background noise of the wind in treetops (Nora Hamilton, Mendocino National Forest, memorandum to the file, November 17, 1992). Also, the USDA FS Technology and Development Program in a report prepared in 1993 and titled "Sound Levels of Five Motorcycles Traveling Over Forest Trails" found that at distances over 400 feet, motorcycles do not raise the ambient sound level (they are no louder than background levels of noise). Absolute quiet is not a reasonable expectation. Sound from motorized sources such as airplanes exists even in the most remote areas. It is not reasonable to expect absolute quiet in areas intended for multiple-use. The sound level of motorized recreation use is not greater than natural sounds, and therefore, sound level should not be used as a reason to justify motorized recreation and access closures.

Response 7-26: Thank you for your comment. The Ogden Travel Plan FEIS and draft SEIS describe a range of Alternatives in response to the purpose and need. As identified in Table 1.6.1, significant issues were used to develop a range of alternatives. Noise was determined to be a

non-significant issue, and thus not used specifically to develop alternatives. An analysis and the effects of noise are documented in Chapter 4 – Environmental Effects.

Comment 7-27: A study of National Park elk habituated to human activity and not hunted were more sensitive to persons afoot than vehicles (Shultz, R.D., and James A. Bailey “Responses of National Park Elk to Human Activity”, Journal of Wildlife Management, v42, 1975). Therefore, hikers disturb elk more than motor vehicles and “disturbance of wildlife” should not be used as a reason to justify motorized recreation and access closures. Additionally, when there are concerns with wildlife disturbance, restrictions on hikers should be given a greater emphasis than restrictions on motorized visitors.

Response 7-27: Forest Service disagrees with the commenter’s interpretation of the study. The study is specific to elk within the National Park. The study states “the elk in this study were habituated to human activity, and were not hunted, and that had a significant effect on the elk responses. Habituated or unhunted elk are less sensitive to human than elk that are rarely exposed to human activity.” The researcher clarifies that in this study elk sensitivity to persons afoot than vehicles, the “difference is not statistically significant.” See Response 7-24.

Comment 7-28: Hikers disturb nesting birds (Swarthout, Elliott and Steidl, Robert, Journal of the Society of Conservation Biology, February 2003) yet restrictions on hiking and other non-motorized recreationist to reduce impacts on nesting birds are rarely imposed.

Response 7-28: See Response 4-1 and 7-32. The referenced article pertains to research conducted within the canyons of southern Utah to assess the effects of hikers on Mexican Spotted Owls (*Strix occidentalis lucida*) within the Colorado Plateau. The Ogden Travel Plan project area does not contain habitat for the Mexican spotted owl and is not located within the Colorado Plateau physiographic province. Therefore comment does not present best available pertinent data and scientific literature. See Response 7-24.

Comment 7-29: Hiking, cross-country hiking and wilderness uses also causes trail impacts yet these impacts are seldom acknowledged. For example, the USDA FS Intermountain Research Station Research Paper INT-450 “Changes on Trails in the Selway-Bitterroot Wilderness, Montana, 1978-89” and dated 1991 found that many trail segments changed markedly, depending on site and use.

Response 7-29: See Response 4-1 and 7-32. The referenced article pertains to research conducted within congressionally designated wilderness areas. The Ogden Travel Plan project area does not contain congressionally designated wilderness and therefore the comment does not present best available pertinent data and scientific literature.

Comment 7-30: Additionally the report “Keeping Visitors on the Right Track – Sign and Barrier Research at Mount Rainier”, Park Science 14(4) published in 1994 found that off-trail hiking is a major source of impact that creates trails and erosion throughout the several thousand acres of sub-alpine meadows.

Response 7-30: Thank you for your comment. See response 7-24.

Comment 7-31: Additionally the report “Erosional Impact of Hikers, Horses, Motorcycles, and Off-Road Bicycles on Mountain Trails in Montana”, Mountain Research and Development, Volume 14, No. 1, and published in 1994 found that multiple comparison test results showed that horses and hikers made more sediment available than wheels, and this effect was most pronounced on pre-wetted trails.

Response 7-31: Reference soils and hydrology sections in the 2007 FEIS chapter 4. The referenced article pertains to research conducted within two trails on the Gallatin National Forest within the state of Montana and therefore the comment does not present best available pertinent data and scientific literature. The FEIS and draft SEIS section 4.3 discloses impacts of sedimentation from District roads and trails. Section 4.4 discloses the effects of soil erosion from both the illegal user developed trails and designated system trails associated with the Alternatives. The FEIS and draft SEIS Section 4.4.3 assumes that all system roads and trails will be located and managed to Forest Service standards that allow for properly drained trail surfaces and mitigate the potential for trail rutting, erosion, and widening. The FEIS and draft SEIS section 1.3.2.3 further defines the Forest Service standards that roads and trails will be managed to. See Response 7-24.

Comment 7-32: There are many double-standards in the impact analyses and decision-making. If the issues surrounding motorized travel are significant enough to justify closures, then, in order to avoid introducing a bias to the evaluation and process the same issues and restrictions should also be applied to hiking, mountain climbing, cross-country hiking, wilderness users, etc.

Response 7-32: Section 1.3 – Purpose and Need provides a thorough discussion of the rationale and context for the Ogden Travel Plan Project. The purpose of this project is to begin to implement the framework of the Revised Forest Plan ROD (2003) for the Wasatch-Cache National Forest, for the objectives of motorized travel management. As a site-specific action, the purpose of the proposed action is to provide the public a safe and reliable system of roads and motorized trails that provide for quality motorized recreation and motorized administrative access for agency personnel and permittees while providing for healthy wildlife habitat, vegetation, stable soils, and high quality water.

A travel plan is needed to address the dramatic increase in demand for motorized recreational experiences. The Section also describes the public need for a safe and reliable system of roads and trails that provide for quality motorized and non-motorized recreation. Lastly, there is a need to systematically analyze which historic and user created trails should be incorporated into the system and which should be closed and rehabilitated.

The analysis in the FEIS and draft SEIS is limited to significant issues as described in Chapter 1. As identified in Table 1.6.1, significant issues were used to develop a range of Alternatives; non-significant issues, although not used specifically to develop Alternatives. The FEIS and draft SEIS primarily address motorized routes during the development of a range of Alternatives for motorized and non-motorized recreation.

Comment 7-33: A study of the heart rate of elk found that humans walking between 20 to 300 meters from the elk caused them to flee immediately 41% of the time while and OHV passing within 15 to 400 meters of the elk caused them to flee 8% of the time (Ward, A.L. and J.J. Cupal. 1976. Telemetered heart rate of three elk as affected by activity and human disturbance. USDA Forest Service, Rocky Mountain Forest and Range Experiment Station. Laramie, WY. 9pp.) Therefore, hikers disturb elk more than motor vehicles and “disturbance of wildlife” should not be used as a reason to justify motorized recreation and access closures. Additionally, when there are concerns with wildlife disturbance, restrictions on hikers should be given a greater emphasis than restrictions on motorized visitors.

Response 7-33: See Response 7-32. As stated in the FEIS and draft SEIS Section 4.6 Wildlife, numerous other studies demonstrate how wildlife are affected by motorized and non-motorized activities.

Comment 7-34: A study of mule deer found that 80% fled in reaction to encounters with persons afoot while only 24% fled due to encounters with snowmobiles (David J. Freddy, Whitcomb M. Bronaugh, Martin C. Fowler, “Responses of Mule Deer to Persons Afoot and Snowmobiles”, Wildlife Society Bulletin, 1986). Therefore, hikers disturb deer more than motor vehicles and “disturbance of wildlife” should not be used as a reason to justify motorized recreation and access closures. Additionally, when there are concerns with wildlife disturbance, restrictions on hikers should be given a greater emphasis than restrictions on motorized visitors.

Response 7-34: See Response 7-32 and Response 7-33.

Comment 7-35: A lynx study completed in the Seeley Lake area found no adverse impact to Lynx from winter snowmobile use. The results of this study and the data that was collected must be used in evaluating areas open or closed to snowmobiles. The closure of any area because of winter motorized impact to lynx is not valid, and therefore, must not be used to initiate closures.

Response 7-35: Snowmobiling is not part of the Ogden Travel Plan, thus comment is outside the scope.

Comment 7-36: The wildlife sections of the travel plan document tends to promote two underlying themes; (1) wildlife and forest visitors cannot coexist, and (2) there are significant negative impacts to wildlife from visitors to the forest. Observations of wildlife in Yellowstone and Glacier National Parks and the 600 deer that live within the Uintah-Wasatch-Cache city limits combined with common sense tell us that wildlife can flourish with millions of visitors and motorized vehicles. Wildlife can and do effectively coexist with motorized visitors in even the most heavily visited places. Therefore, concerns with motorized forest visitors and wildlife are over-stated and over-emphasized which unfortunately demonstrates a predisposition in the process.

Response 7-36: Thank you for your comment.

Comment 7-37: The wildlife/visitor interaction in national parks demonstrates that the manner in which visitors coexist with wildlife is the most significant factor in the interaction between

wildlife and visitors. The manner in which visitors coexist with wildlife in national forest can be shaped by adequate use of mitigation measures including seasonal closures, educational programs and trail rangers. Therefore, reasonable alternatives to the closure of motorized roads and trails exist and can be used to address wildlife concerns. We request that these sorts of reasonable alternatives to closure of roads and trails to motorized visitors be adequately considered and incorporated into the preferred alternative.

Response 7-37: Table 2 in the Record of Decision provides a detailed description of seasonal closures over a range of alternatives. Section 2.9 - Implementation list the top priorities for travel plan to improve information to the users of the National Forest. Appendix D Mitigation and Monitoring address user education, patrols, and law enforcement.

Comment 7-38: The road density criteria is not valid because hundreds of deer in Uintah-Wasatch-Cache and elk in the Montanan City area exist just fine with road densities far in excess of the targets for the project area. Obviously there are other factors that have a far greater influence on deer and elk populations and the analysis must uncover and use those.

Response 7-38: Thank you for your comment. As stated in Chapter 1, road densities have been tied to fragmentation and the need to maintain connectivity of habitats for the movement of wildlife through the area. The concern was raised during scoping that increased road density and changing uses of roads and trails have an effect on fragmentation of wildlife habitats. This was identified as a significant issue that drove alternatives development. Section 4.6 and 4.14 describes effects of road density and other factors on wildlife.

Comment 7-39: The actual zone of influence of motorized trails on wildlife is very small.

Response 7-39: See Response 7-22.

Comment 7-40: “Present day populations of white-tailed deer and elk are at their highest levels recorded in recent history” (Montana Wolf Conservation and Management Planning Document, Montana Fish, Wildlife and Parks, January 2000 (<http://www.fwp.state.mt.us/wildthings/wolf/wolfmanagement011602.pdf>)). Additionally, “nearly 60 percent of Montana’s original elk management units exceed elk-population objectives, while only 31 percent exceed harvest objectives” (www.fwp.state.mt.us/hunting/elkplan.html).

Response 7-40: The Forest Service was unable to locate the first reference provided by the commenter and therefore we are unable to provide an adequate response. The latter reference pertains to species information within the state of Montana. This is not within the Ogden Travel Plan project area and therefore comment does not present best available pertinent data (See Response 7-22).

Comment 7-41: The number of hunters is declining (U.S. Fish and Wildlife Service, 1996 National Survey of Fishing, Hunting and Wildlife-Associated Recreation. http://library.fws.gov/nat_survey1996.pdf and <http://www.cbsnews.com/stories/2007/09/03/national/printable3228893.shtml>). Therefore there are no compelling reasons “to evaluate the level of elk security in the project area and...enhance

elk populations” as frequently suggested by wildlife biologists (example; Fish, Wildlife and Parks letter dated February 27, 2002 to Uintah-Wasatch-Cache National Forest on the Clancy-Unionville Travel Planning Project, bottom of page 9). Additionally, there are no compelling reasons to justify reduced road densities as a sought-after or necessary wildlife management criterion. Lastly, there are reasonable alternatives including permit hunting and seasonal travel restrictions that can better accomplish the outcome sought by reduced road and trail densities. NEPA requires consideration and implementation of all reasonable alternatives. Not considering and implementing reasonable alternatives demonstrates a predisposition in the process.

Response 7-41: See Response 7-17.

Comment 7-42: In the past many of the impacts associated with motorized recreation were based on opinions about the impacts on wildlife. The courts have clearly established the prevailing standard for evaluating scientific evidence in *Daubert vs. Merrell Dow Pharmaceuticals Inc.* (DAUBERT v. MERRELL DOW PHARMACEUTICALS, INC., 509 U.S. 579 (1993)) (http://caselaw.lp.findlaw.com/scripts/prINTER_friendly.pl?page=us/509/579.html), in which the U.S. Supreme Court ruled that expert testimony must be based on a testable theory or method that has passed peer review, has a known error rate and has reliable results. In part, the Daubert ruling was triggered by the proliferation of experts and professional witnesses who expressed their opinion in reports and testimony as opposed to sound scientific principles and evidence. Therefore, peer reviewed reports and recommendations are mandatory in order to protect the public from personal opinion. We request that an adequate peer review plan and process be used for all impact analyses and include experts that are neutral about motorized recreation.

Response 7-42: See Response 7-22.

Comment 7-43: Wildlife security criteria and standards in the forest plan are out of date. The science, data and findings as far as road density and impact of motorized vehicles on wildlife have changed significantly. This new information must be considered in this evaluation as required by federal best available science and data accuracy requirements.

Response 7-43: See Response 7-22 and Response 7-38.

Comment 7-44: OHV use and wildlife can and do coexist. We do not see any evidence in the field that would indicate that summer motorized recreation use is a significant wildlife problem. We support motorized closures where necessary to protect wildlife during the spring calving season and hunting season while maintaining a reasonable level of access during those periods.

Response 7-44: See Response 7-22. Chapter 2 – Alternatives describes a range of alternatives for open, closed, and seasonal routes.

Comment 7-45: While Revised Statute 2477 was repealed by the 1976 National Forest Management Act, the revision clearly stated in the Act was to insure that no new roads from the effective date of the Act would be considered for RS 2477 consideration. It further clarified the historical highways would be honored. That is all that the 1976 Act modified or repealed. Until

the federal government completely repeals the 1866 Act, (Revised by the 1872 Act) in its entirety the citizens of the United States still have the right to access lands for the benefit of the people of the United States. The decision rendered by the 10th circuit re-affirms this (<http://www.kscourts.org/ca10/datefile/datefile.htm> look under 9-8-2005, and then 04-4071 - Southern Utah Wilderness Alliance v. Bureau of Land Management). The court has ruled that the rights exercised by the counties would be valid if the routes in question were indeed 2477 classified. The county has records that show that the routes were there prior to the establishment of the 1976 NFMA and FLPMA and, are therefore, valid RS 2477 routes. Additionally, it is the responsibility of the agency proposing a closure action to adequately research those records and establish which routes meet RS 2477 classification and then consult and coordinate with the County with respect to that classification. The Ogden Ranger District Travel Plan project area includes many important RS 2477 routes that were established by miners, loggers, and early settlers. We request that this project include adequate research of the county records and adequate formal consultation and coordination with the county to identify RS 2477 routes and include them as historic motorized routes.

Response 7-45: Section 2.5.13 R.S. 2477 Roads states the current direction in reference to counties R.S. 2477 assertion on roads across National Forest. The section also discloses that individuals and entities may have established valid existing rights under R.S. 2477. Determination of those rights is not within the scope of this decision but will be made at the time each county submits the necessary claims. Chapter 6 lists the local county governments that were consulted during the planning process.

Comment 7-46: The most equitable management of public lands is for multiple-uses. Congress recognized this need with many laws including the Multiple Use Sustained Yield Act of 1960 (16 U.S.C. 528 et seq.) and National Forest Management Act of 1976. Multiple-Use was defined as “*The management of all the various renewable surface resources of the national forests so that they are utilized in the combination that will best meet the needs of the American people...*”.

Outdoor recreation is the first stated purpose of the act. Note that the pre-Columbian management scheme has not been enacted by Congress. Therefore, the Forest Service has a responsibility to provide recreational opportunities that meet the needs of the public just as government entities provide road, water and wastewater systems that meet the needs of the public.

Public Law 88-657 states that “*the Congress hereby finds and declares that the construction and maintenance of an adequate system of roads and trails within and near the national forests and other lands administered by the Forest Service is essential if increasing demands for timber, recreation, and other uses of such lands are to be met; that the existence of such a system would have the effect, among other things, of increasing the value of timber and other resources tributary to such roads; and that such a system is essential to enable the Secretary of Agriculture (hereinafter called the Secretary) to provide for intensive use, protection, development, and management of these lands under principles of multiple use and sustained yield of products and services.*”.

The Federal Land Policy and Management Act of 1976 (FLPMA) states that “(7) *goals and objectives be established by law as guidelines for public land use planning, and that management be on the basis of multiple use and sustained yield unless otherwise specified by*

law; and, (c) In the development and revision of land use plans, the Secretary shall -- (1) use and observe the principles of multiple use and sustained yield set forth in this and other applicable law;”.

Multiple-use management goals are the only goals that will “best meet the needs” of the public and provide for equal program delivery to all citizens including motorized visitors. All of visitors have a responsibility to accept and promote diversity of recreation on public lands. Diversity of recreation opportunities can only be accomplished through management for multiple-uses and reasonable coexistence among visitors. Multiple-use lands must be managed for shared-use versus segregated-use or exclusive-use. Multiple-use lands are public places. Segregation in public places has not been acceptable since the Civil Rights Act of 1964.

A significant closing of roads and motorized trails in the project area is not consistent with meeting the needs of the public and the goals of Multiple-Use Management as directed under Federal Land Policy and Management Act of 1976 (FLPMA), Multiple Use Sustained Yield Act of 1960 and P.L. 88-657. Legally designated multiple-use lands must not be managed for limited-use instead of multiple-use. This is a significant issue and must be adequately addressed. We request full compliance with multiple-use policies and laws and the development of a Pro-Recreation preferred alternative that will support these policies and laws and the needs of the public.

Response 7-46: Thank you for your comment. The Multiple Use-Sustained Yield Act of 1960 authorized and directs the Secretary of Agriculture to develop and administer the renewable resources of timber, range, water, recreation and wildlife on the national forests for multiple use and sustained yield of the products and services. Forest Service regulations and policies are supplemental to, but not in derogation of, the purposes for which the national forests were established. Section 1.3.2 of the FEIS and draft SEIS describes many sources that direct the management and administration of National Forest Service lands. No conflicts have been identified with other Federal, State, or local agencies or with Native Americans, other minorities, women, or civil rights of any United States citizen.

Comment 7-47: A program similar to the following is needed to help the agency better understand the needs of motorized single-track trail riders which have been ignored in the analysis.

Single Track Summit - AZ State Park OHV Program

Arizona State Parks Off-Highway Vehicle Program is excited to host this first ever event focused on bringing riders and land managers together to understand the unique trail requirements of motorcycle riders, building partnerships between rider groups and agencies, developing project proposals, and how to pay for all this work using YOUR OHV Fund. Everyone should leave this event with knowledge and contacts to help develop single track opportunities statewide.

Please join us for what will prove to be a productive day with just enough fun stuff sprinkled in to make it exciting. We have a video short on single track riding, GoPro footage of local technical riding, and will screen the recently released adventure riding film about the Arizona

Backcountry Discovery Route. Plus we will have some motorcycles on display that are used for single track riding and adventure touring.

SINGLE TRACK SUMMIT SCHEDULE OF EVENTS

Saturday 8:00am - 9:00am: Continental Breakfast and check-in

9:00am: Summit Kickoff & Morning Presentations

noon - Lunch and screening of the Arizona Backcountry Discovery Route

1pm Afternoon Presentations & Meet the Land Managers

4pm Summit Wrap Up

Presenters

Coconino National Forest & Coconino Trail Riders - The Kelly Canyon Experience

Trail Riders of Arizona - Developing Partnerships

Bureau of Land Management - Project Design and Long Distance Connections

Arizona State Parks - Making it Rain, Project Funding Mechanisms and Doing Business with the State

Tonto Recreation Alliance - Keys to Being a Good Partner

Surprise Guests

Sunday (optional)

Trail Ride - Location to be determined, bring your own motorcycle

Response 7-47: The Forest Service agrees with this comment. Section 1.3.2.3 describes Forestwide Subgoals for increasing recreation user stewardship, involving users in developing strategies for managing recreation, and encouraging private enterprise to develop recreation facilities.

Comment 7-48: Public understanding of the proposed alternatives would be greatly improved by implementing a mapping tool similar to the one developed by Idaho Parks and Recreation. This tool can be tried out at <http://www.trails.idaho.gov/trails/>. Zoom in and click on a particular trail to see the information provided for each route. Earlier versions of this tool included GPS downloads for each route which would help assure that the public was on the right trail. This tool would also be useful after the analysis and decision to inform the public of the route designations.

Response 7-48: Comment noted.

Comment 7-49: NEPA law requires adequate public disclosure including adequate public involvement, and discussion of potential impacts in the environmental document. NEPA and CEQ guidance includes CEQ Sec. 1500.1 Purpose. *Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail. It shall provide full and fair discussion of significant environmental impacts and shall inform decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment. Agencies shall focus on significant environmental issues and alternatives and shall reduce paperwork and the accumulation of extraneous background data. Statements shall be concise, clear, and to the point, and shall be supported by evidence that the agency has made the*

necessary environmental analyses. In order to adequately meet disclosure requirements the environmental document must include an accurate estimate of the magnitude of the benefit to the natural environment versus an accurate magnitude of the impact including dollars, measures of recreation time and benefit on the human environment. For example, the public needs to know that a salmon run can be increased by 1,000 fish but at an annual loss in energy production of \$10,000,000 for a cost \$10,000 per fish. Another example would be the closure of 50 miles of OHV routes so that 2 lynx are not minimally disturbed resulting in the loss of 5,000 person days of recreation at a value of \$150 per day for a cost of \$750,000 per year. An adequate sense of magnitude must be employed in the impact determinations. This information must be disclosed to the public so that they are adequately informed and can adequately comment on significant issues surrounding impacts on the human environment. Adequate disclosure of this information will also allow decision-makers to better evaluate all reasonable alternatives and make more reasonable decisions based on a realistic sense of magnitude.

Response 7-49: The Forest Service agrees with your comment regarding the need to adequately inform the public and allow opportunity for comment. Public involvement and environmental consequences, as required by NEPA and set forth by regulations in 40 CFR parts 1501 and 1502, are described in Section 1.6 and Chapter 4, respectively. Each resource provides a description and rationale for the methodology used to estimate the effects of each alternative. The Forest Service responsible official will review the EIS and supporting record in order to reach a decision for implementation of an alternative.

Comment 7-50: With respect to impact assessment, if you cannot measure or have not measured an impact then it is not a real impact.

Response 7-50: Indicators used to compare Alternatives in Table 1.6.1 were developed with the specialists. The indicators are quantifiable and interpreted for each Alternative in Chapter 4. When quantifiable indicators are not used, a qualitative interpretation of effects is presented.

Comment 7-51: Another example of theoretical impact with no real magnitude would be the lighting of a match theoretically increases the temperature of the earth's climate but in reality the magnitude is so insignificant that it is not real. All theoretical benefits to the environment must include a magnitude of the benefit. A sense of magnitude has not been used in the impact assessment and must be adequately incorporated into the impact assessment.

Response 7-51: See Response 7-50.

Comment 7-52: Impacts associated with beetle-killed trees, fires, and floods are acceptable to the agency. OHV impacts are insignificant when compared to beetle-killed trees, fires, and floods. A comparison to natural impacts such as beetle-killed trees, fires and flood is a reasonable test for magnitude of impacts.

Response 7-52: The potential for beetle-killed trees, fires, and floods, although possible, is somewhat speculative. It would be very difficult to predict and quantify and is beyond the scope of this analysis.

Comment 7-53: A small level of theoretical negative impact from OHV recreation does not reasonably equate to the need for massive motorized closures.

Response 7-53: Purpose and Need for the Proposed Project describes the public need for a safe and reliable system of roads and trails that provide for quality motorized and non-motorized recreation. A range of alternatives have been developed to meet the Purpose and Need. Chapter 4 discloses the positive and negative impacts for the Alternatives.

Comment 7-54: OHV recreation is extremely popular in Utah. Note that many OHVs are used by multiple residents. The Southern Recreation Report identifies 490,000 OHV recreationists in Utah. At 500 miles per year per OHV (a very conservative estimate), the total miles driven per year in Utah would equal 75,000,000 miles. At an average speed of 18 miles per hour, the total hours of OHV recreation per year in Utah is conservatively estimated at 4,200,000 hours. At a value of \$25 per hour the total value to the economy on Utah is conservatively estimated at \$105,000,000. Therefore, OHV recreation is a significant part of the economy in Utah and in the Ogden Ranger District Project Area.

Response 7-54: Section 1.3.1 Purpose and Need describes the public need for a safe and reliable system of roads and trails that provide for quality motorized and non-motorized recreation. It also acknowledges the need to address the dramatic increase in demand for motorized recreational experiences within the Ogden Ranger District project area. Section 3.2 Transportation Systems and Section 3.7 Recreation describe the existing condition within the planning area. The analysis in the FEIS and DSIES is limited to significant issues and economics was not considered.

Comment 7-55: The Government Accounting Office (GAO) has recently released a report with recommendations on long- and short-term improvements that could reduce maintenance backlog and enhance the sustainability of trails on the public lands (<http://www.gao.gov/products/GAO-13-618>). Specific recommendations include Agency officials and stakeholders GAO interviewed collectively identified numerous options to improve Forest Service trail maintenance, including (1) assessing the sustainability of the trail system, (2) improving agency policies and procedures, and (3) improving management of volunteers and other external resources. In a 2010 document titled A Framework for Sustainable Recreation, the Forest Service noted the importance of analyzing recreation program needs and available resources and assessing potential ways to narrow the gap between them, which the agency has not yet done for its trails. Many officials and stakeholders suggested that the agency systematically assess its trail system to identify ways to reduce the gap and improve trail system sustainability. They also identified other options for improving management of volunteers. For example, while the agency's goal in the Forest Service Manual is to use volunteers, the agency has not established collaboration with and management of volunteers who help maintain trails as clear expectations for trails staff responsible for working with volunteers, and training in this area is limited. Some agency officials and stakeholders stated that training on how to collaborate with and manage volunteers would enhance the agency's ability to capitalize on this resource. CTVA has a long history of collaboration on trail construction and maintenance projects that we would like to continue to build on.

Response 7-55: See Section 2.5.1 on the annual maintenance program. Section 1.3.2.3 Forest Plan identifies in the Forestwide Goal 8 – Enforcement, increasing the participation of individuals and organized groups in monitoring uses.

Comment 7-56: Additionally, OHV recreation generates millions of dollars in OHV gas tax revenues which should be used to for trail maintenance (see additional comments and Oak Ridge National Laboratory, 1994, Federal Highway Administration, Report ORNL/TM-1999/100, Federal Highway Administration, An 80 page summary of the fuel used for OHV recreation, http://www-cta.ornl.gov/cta/Publications/Reports/ORNL_TM_1999_100.pdf). Unfortunately, these dollars are not being applied to OHV trails. Bringing volunteers together with funding would solve nearly all of our OHV trail maintenance needs.

Response 7-56: Using gas tax revenues for trail maintenance is outside the scope of this project. See comment 7-55 in regards to volunteers and maintenance.

Comment 7-57: The use of “unauthorized trails or roads or user-created routes” is not an appropriate term as many of these routes were created during periods going back to the 1800’s when the forest was managed without designated routes, cross-country travel was allowed, and access and use of the forest was encouraged. Many of these routes have been used for decades and are “historic routes”. Many of these routes are shown on versions of the forest map, and 7.5 minute and 15 minute USGS quadrangle mapping. The use of “unauthorized trails or roads or user-created routes” is an inaccurate representation of the management conditions and uses allowed in the past. These are also terms developed by non-motorized interests that have been given an inaccurate negative connotation through their campaigns. We request that this term be dropped from the text and that these routes be recognized as appropriate routes in the analysis.

Response 7-57: Thank you for your comment. “Unauthorized road or trail” and “user created” are Forest Service terms. Section 1.3.1 Purpose and Need briefly describes evolution of the system of roads and motorized trails. It identifies the need to systematically analyze which of these historic and user created routes should be incorporated into the transportation system and which should be closed and rehabilitated. An inventory was completed by Forest Service personnel that verified and mapped existing designated classified routes and unclassified abandoned and user created routes. Section 4.7 describes methods and assumptions that were used to compare the environmental effects for each Alternative.

Comment 7-58: The underlying definition of the “environment” that the Forest Service has chosen to use in the impact analyses and decision-making places an emphasis and priority on the “resource” environment in the project area. NEPA was very clear that the total complement of the environment was to be considered in the impact analyses and decision-making including the guiding purpose statement “achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life’s amenities” (Public Law 91-190, Title I, Section 101 (b) (5)). The wording of NEPA was carefully chosen and was intended to produce a balance between the resource environment and population or human environment. NEPA was not intended to be used to put an end to human access and use of the resources. However, the Forest Service is using the NEPA process inappropriately by creating significant cumulative impacts on the human environment through a series of travel plan decisions aimed at removing

the public from public lands. This trend does not conform to Public Law 91-190 and must be corrected by implementing a pro-recreation alternative as part of this action.

Response 7-58: Thank you for your comment. The draft SEIS follows the NEPA process and analyzes a range of alternatives for motorized and non-motorized recreation with varying effects on all resources.

Comment 7-59: An excellent reference is Tom Crimmins and NOHVCC booklet titled Management Guidelines for OHV recreation which can be downloaded at <http://atfiles.org/files/pdf/crimminsNOHVCC.pdf>. Other good references for OHV recreation can be found in the American Trails library at <http://www.americantrails.org/resources/motors/index.html> and on the NOHVCC web site at <http://www.nohvcc.org/home>.

Response 7-59: Comment noted.

Comment 7-60: Motorized recreationists value high quality trails with views, vistas, and challenging riding. The project area includes many of these types of routes for OHV recreationists.

Response 7-60: The Forest Service agrees. Thank you for your comment.

Comment 7-61: Because of the significant number of motorized visits to the forest and significant issues associated with motorized closures (both points are documented in our comments and the comments of other motorized recreationists), the preferred alternative must not reduce motorized opportunities. Moreover, in order to address the issues and needs of the public, a reasonable preferred alternative would provide for an increase in motorized opportunities.

Response 7-61: Thank you for your comment. We feel that the range of alternatives is adequate to meet the Section 1.3.1 – Purpose and Need which describes the public need for a safe and reliable system of roads and trails that provide for quality motorized and non-motorized recreation. It also indicates the need to address the dramatic increase in demand for motorized recreational experiences. The draft SEIS and FEIS describe a range of alternatives for motorized and non-motorized recreation. Section 2.4 – Alternatives Considered in Detail include actions for more motorized opportunities analyzed in this document.

Comment 7-62: In order to be legally defensible the following two tests must be used to identify any proposed motorized route closures: 1) the proposed closure of a motorized route must be based on site specific data and documentation of actual significant impacts caused by motorized recreation, and 2) the documented impacts from motorized recreation must be substantially more significant than naturally occurring events.

Response 7-62: Chapter 2 describes the methodology used by the Forest Service to collect, analyze, and document authorized and unauthorized routes. As identified in Table 1.6.1 significant issues were used to develop a range of alternatives. Non-significant issues, although

not used specifically to develop alternatives, are included in the analysis and the effects are documented in Chapter 4 – Environmental Effects.

Comment 7-63: Because of the significant negative cumulative impact of all motorized closures and if the two tests outline above are met, then a reasonable alternative that must be included for public input is a trade of the closed motorized route for a motorized route of equal opportunity and value in a different location.

Response 7-63: The Ogden Travel Plan FEIS which is incorporated by reference and draft SEIS describe a range of alternatives for motorized and non-motorized recreation in section 2.4 – Alternatives Considered in Detail. The effects of motorized use are described in Chapter 4.

Comment 7-64: Utah is struggling with the existing economic conditions which confirm that an economy based largely on wilderness recreation will be limited. Further decisions that force the economy to rely solely on wilderness and non-motorized recreation will move in a direction that will result in further economic hardship. At the same time, Utah has a significant amount of land intended for multiple-use. Managing for reasonable multiple-use on all federal lands would allow the Utah to further develop an economy based on snowmobile recreation in the winter and OHV recreation in the summer which would bring better economic conditions to the area. This concept would not infringe on wilderness and is an entirely reasonable alternative. Therefore, a Pro-Recreation Alternative must be developed for the Ogden Ranger District Travel Planning project. The project area could become as successful Marysvale, Utah area (<http://www.marysvale.org/>) which is based on the Paiute trail and the Caliente and Pioche, Nevada area which is based on the Chief Mountain and Silver State Trail systems (<http://nvtrailmaps.com/trail.php?trail=708>). These trail systems bring in thousands of motorized recreationists who buy lodging, meals, parts, fuel, and goods in adjacent towns.

Response 7-64: Economic impacts were discussed in Chapter 3. The analysis is limited to significant issues and economics was not considered. Snowmobiling is not part of the scope of the draft SEIS. See Revised Forest Plan for decisions regarding winter motorized activities. The Forest Service was unable to locate the second reference provided by the commenter.

Comment 7-65: The Ogden Ranger District Travel Management Project area is a popular area for motorcycle single-track trail riding for riders from Utah and across the nation. There is a significant need for these opportunities and this significant issue must be adequately addressed.

Response 7-65: Section 1.3.1 describes the need to address the dramatic increase in demand for motorized recreational experiences. Chapter 2 describes a range of alternatives for motorized recreation.

Comment 7-66: Motorized recreationists support the use of mountain bikes on motorized trails. A reasonable alternative would be to share the mountain bike trails with motorcycles. Both vehicles create and use the same “single-track” trail foot print. As proposed there are no motorcycle trails. Furthermore, based on our experience keeping trails free of downfall in the last 5 years, mountain bikers without chainsaws will not be able to maintain the trail system and it will not be functional. For example, on our last outing to the Helmville-Gould trail at the end of

the season last fall, we had to remove 50-60 downed trees to get through even though it was late in the season. The Brooklyn Bridge route in the Clancy-Unionville area is another example of a route that is becoming closed by downfall. Motorcyclists would be quite willing to help build and maintain a motorcycle/mountain bike single-track trail system. This is a reasonable alternative that must be adequately addressed.

Response 7-66: Section 2.5.6 – Non-motorized Use on Motorized Trails of the draft SEIS and FEIS which is incorporated by reference describes mountain bike use on transportation routes. Chapter 2 describes a range of alternatives for motorized trails open to motorcycles or ATVs as well as single-track trails open only to motorcycles, not ATVs. Motorized trails are system trails open to motorized use, either motorcycle single-track trail or an ATV motorized trail. Or a system road that will be managed as a Motorized Trail. See the Glossary for further definitions of single-track motorized trail, ATV trail, and OHV. See Section 2.5.1 on the annual maintenance Program. Section 1.3.2.3 Forest Plan identifies in the Forest wide Goal 8 – Enforcement, increasing the participation of individuals and organized groups in monitoring uses.

Comment 7-67: We have observed that motorized trails that have been closed to provide “non-motorized opportunities” see very little or no use. Another example is the Upper Hellgate Gulch trail closed as part of the North Belts Travel Plan. As shown below there is no evidence of use and the trail is now closed by downfall.



Upper Hellgate Gulch Non-Motorized Trail

Response 7-67: Thank you for your comment. Alternatives have been developed to meet the purpose and need for a safe and reliable system of roads and trails that provide for quality motorized and non-motorized recreation. Chapter 2 provides a range of alternatives for motorized and non-motorized recreation. Monitoring of the decisions made in the analysis will be done according to the strategy outlined in the draft SEIS and FEIS. See Section 2.6 – Monitoring Activities Common to All Alternatives and Appendix D for more detail.

Comment 7-68: Cumulative effects of locked gates that now prevent public motorized access. This is an ever increasing issue that now significantly affects the public.

http://Uintah-Wasatch-Cacheir.com/news/state-and-regional/locked-gates-prevent-access-to-national-forest/article_0428b09d-0fa2-516c-a989-e5738c8aee9a.html?print=true&cid=print
http://Uintah-Wasatch-Cacheir.com/news/local/road-accessing-national-forest-land-gated-locked/article_f9d0dbde-4655-11e2-a8d3-0019bb2963f4.html?print=true&cid=print

Response 7-68: See Response 4-1. The Forest Service was unable to locate the two references provided by the commenter. Chapter 2 describes a range of alternatives for management actions and Section 2.9 describes gating roads as a priority for implementing the travel plan.

Comment 7-69: Elk Cover Requirements. Elk do well in places like Nevada without trees. Additionally, elk were originally a plains animal and survived just fine without trees. Effective elk hiding is provided by mountains, hills, ravines, ridges, rocks, brush. These land factors must be incorporated into the elk hiding cover equation. Recent analysis by the Uintah-Wasatch-Cache National Forest for the Elkhorn Wildlife Management Area has demonstrated that a reasonable consideration of the topography in the area would meet the requirements for elk security. This reasonable and realistic approach to elk cover and wildlife security requirements must be part of the Ogden Ranger District Travel Planning analysis.

Response 7-69: See Response 4-1 and Response 7-18.

Comment 7-70: Additionally, wolves have radically changed elk behavior and use of tree canopy. Elk now avoid tree cover because the cover allows wolves to prey upon them easier. Elk now prefer open areas where they can “keep an eye” on the wolves and defend themselves. Therefore, tree cover is not a significant benefit to elk at this time and this changed condition must be recognized.

Response 7-70: See Response 4-1. Section 3.6 discusses the affected environment for elk and the gray wolf and Section 4.6 discusses environmental effects. All discussions have used best available data and peer reviewed literature as referenced within the draft SEIS and FEIS.

Comment 7-71: Research and documents including the following clearly demonstrate that OHV recreation has no more impact on wildlife than other forms of recreation and is in fact less in many cases (references available upon request):

- a) Chapter 6, Ungulates, Effects Of Recreation On Rocky Mountain Wildlife, A Review For Montana, 1999.
- b) A Partial Literature Review Of The Effects Of Various Human Activities On Wildlife, Compiled By Nora Hamilton, Bureau Of Land Management, National Technical Assistant For Trails, September, 1997.
- c) Ward, Lorin A., Jerry J. Cupal, "Telemetered Heart Rate of Three Elk as Affected by Activity and Human Disturbance", Planning for Trailbike Recreation, US Department of the Interior Heritage, Conservation and Recreation Service, 1976.

Response 7-71: Chapter 4 discusses environmental effects of the Alternatives on wildlife. All discussions have used best available data and peer reviewed literature as referenced within the draft SEIS and FEIS.

Comment 7-72: Therapy – The treatment of stress or disorders, as by some remedial, rehabilitating, or curative process. Unfortunately, there is a significant need for OHV opportunities for therapy for our wounded warriors. We have found that riding OHVs can be some of the best therapy available for those that have served our country in the armed forces and now have a need for a curative process

Response 7-72: See Response 4.1. Table 1.6.1 – Significant Issues and Indicators identifies recreation general issues and indicators related to changes in ROS and effects on different types of users.

Comment 7-73: Held to an Unnatural Standard – air quality, water quality, impact on fish and wildlife, level of erosion. Fires, floods, natural levels of erosion all produce far greater impacts on air quality, water quality, and fish and wildlife. Motorized recreationists are being held to an unnatural standard which clearly indicates a grievous bias. Impacts associated with motorized recreation including sedimentation and disturbance of wildlife are being judged as significant when in reality they are less than the natural level of sedimentation and impacts on wildlife associated with fires and floods. Being held to a level of impact that is less than the natural level is proof of a strong bias in the evaluation process and arbitrary and capricious decision-making.

Response 7-73: See Response 4-1. Chapter 1 discusses significant issues and comments not addressed in the analysis. The potential for fires and floods, although possible, is somewhat speculative. It would be very difficult to predict and quantify and is beyond the scope of this analysis.

Comment 7-74: Impact Assessment. With respect to impact assessment, if you cannot measure an impact then it is not a real impact. Impacts associated with beetle killed trees and fires are acceptable to the agency. OHV impacts are minimal when compared to beetle killed trees and fires.

Response 7-74: See Response 4-1. The potential for beetle killed trees and fires, although possible, is somewhat speculative. It would be very difficult to predict and quantify and is beyond the scope of this analysis.

Comment 7-75: Motorized recreationists are being squeezed out of the high quality places on our public lands including high elevation mountains, high elevation lakes, and other scenic areas. This trend has created significant socio-economic issues including equal access and cumulative effects that must be adequately addressed and mitigated as part of this action.

Response 7-75: Section 1.3.1 – Purpose and Need describes the public need for a safe and reliable system of roads and trails that provide for quality motorized and non-motorized recreation. It also acknowledges the need to address the dramatic increase in demand for motorized recreational experiences within the Ogden Ranger District project area. Economic impacts were discussed in Chapter 3. The analysis is limited to significant issues and economics was not considered.

Comment 7-76: A video produced by Carl Adams presents many of the significant issues and concerns that are frequently expressed by members of our club and other motorized recreationists in the community. http://www.youtube.com/watch?v=0kUhLMi97dg&feature=g-user-lik&context=G23216abUCGXQYbcTJ33bB0U1oCKI_9bcFlhATY2tUW6mr0rddyBQc

Response 7-76: See Response 4-1 and Response 7-32.

Comment 7-77: The most equitable management of public lands is for multiple-uses. Congress recognized this need with many laws including the Multiple Use Sustained Yield Act of 1960 (16 U.S.C. 528 et seq.) and National Forest Management Act of 1976. Multiple-Use was defined as “The management of all the various renewable surface resources of the national forests so that they are utilized in the combination that will best meet the needs of the American people...”. Outdoor recreation is the first stated purpose of the act. Note that the pre-Columbian management scheme has not been enacted by Congress. Therefore, the Bureau of Land Management and Forest Service have a responsibility to provide recreational opportunities that meet the needs of the public just as government entities provide road, water and wastewater systems that meet the needs of the public.

Public Law 88-657 states that “the Congress hereby finds and declares that the construction and maintenance of an adequate system of roads and trails within and near the national forests and other lands administered by the Forest Service is essential if increasing demands for timber, recreation, and other uses of such lands are to be met; that the existence of such a system would have the effect, among other things, of increasing the value of timber and other resources tributary to such roads; and that such a system is essential to enable the Secretary of Agriculture (hereinafter called the Secretary) to provide for intensive use, protection, development, and management of these lands under principles of multiple use and sustained yield of products and services.”.

The Federal Land Policy and Management Act of 1976 (FLPMA) states that “(7) goals and objectives be established by law as guidelines for public land use planning, and that management be on the basis of multiple use and sustained yield unless otherwise specified by law; and, (c) In the development and revision of land use plans, the Secretary shall -- (1) use and observe the principles of multiple use and sustained yield set forth in this and other applicable law;”.

Multiple-use management goals are the only goals that will “best meet the needs” of the public and provide for equal program delivery to all citizens including motorized visitors. All of visitors have a responsibility to accept and promote diversity of recreation on public lands. Diversity of recreation opportunities can only be accomplished through management for multiple-uses and reasonable coexistence among visitors. Multiple-use lands must be managed for shared-use versus segregated-use or exclusive-use. Multiple-use lands are public places. Segregation in public places has not been acceptable since the Civil Rights Act of 1964.

A significant closing of motorized trails and snowmobile areas in the project area is not consistent with meeting the needs of the public and the goals of Multiple-Use Management as directed under Federal Land Policy and Management Act of 1976 (FLPMA), Multiple Use Sustained Yield Act of 1960 and P.L. 88-657.

Response 7-77: See Response 4-1, 7-1, and 7-46. The Federal Land Policy and Management Act of 1976 governs BLM management of federal land. Snowmobiling is not part of the Ogden Travel Plan, thus comment is outside the scope.

Comment 7-78: The needs of the aging baby boomer population and their desire for adequate motorized access and motorized recreation is a significant issue that is brought up continually at our monthly meetings and in many discussions with other motorized recreationists. This significant issue must be recognized and given a hard look in the Purpose and Need, adequately addressed as part of the human environment and adequately addressed by the development of a reasonable Pro-Recreation alternative.

Response 7-78: See Response 4-1. Section 1.3.1 – Purpose and Need for the Proposed Project describes the public need for a safe and reliable system of roads and trails that provide for quality motorized and non-motorized recreation. Chapter 1 identifies significant issues that were used to develop a reasonable range of alternatives in response to the purpose and need.

Comment 7-79: Since 1988, forest fires have eliminated many motorized roads and trails. These losses have occurred due to deadfall, re-growth, and loss of trail tread associated with the forest fire. These losses are occurring with every fire. For example, the motorcycle single-track trail #418 from Snowbank Lake to Stonewall Mountain and road #771 the Snow-Talon fire area in the Lincoln Ranger District of the Uintah-Wasatch-Cache National Forest has been lost to motorized use. Utah has suffered many forest fires and trails have been significantly impacted. Motorized losses due to forest fires are occurring in every National Forest. The loss of motorized opportunities from fires has become a significant cumulative impact and issue to motorized recreationists. The cumulative loss and negative effect on motorized recreationists due to loss of recreational opportunities due to fires within the project area, forest and region is a significant issue that must be evaluated as part of this travel plan. The evaluation should also address mitigation measures necessary to reduce the significant impact of losses due to fires on motorized recreationists.

Response 7-79: See Response 4-1 and 7-52. Example is not in the Uinta-Wasatch-Cache planning area and therefore comment is not pertinent.

Comment 7-80: The final OHV Rule (<http://www.fs.fed.us/recreation/programs/ohv/final.pdf>) required site-specific analysis as part of the route designation process. Motorized recreationists agreed to accept the rule on this basis. Site-specific analysis was mentioned 11 times throughout the rule and this project must meet the requirements for site-specific analysis.

Response 7-80: See Response 4-1. The draft SEIS and FEIS describes the types of vehicles can be used on specific routes, seasonal restrictions on specific route and routes that are open only for “administrative use.” Specifics vary across a reasonable range of Alternatives and environmental effects are analyzed in Chapter 4.

Comment 7-81: An adequate site-specific analysis should include monitoring and quantification of existing motorized use versus non-motorized use, types of motorized use and visitors, and effects of motorized closures on the quality of the human environment. Examples and goals of site-specific analysis include: 1) single-track trails should be designated for motorcycle and mountain bike use, 2) 48" width routes areas should be designated for ATV use, 3) routes wider than 48" should be designated for UTV and 4x4 use, 4) open riding areas should be designated for trials bikes which have different riding area requirements than trail riding, and 5) motorized trail systems should be provided for all skill levels and types of popular motorized vehicles so that the needs of all motorized users are adequately addressed. Site-specific analysis in the motorized route designation process should also adequately consider the mileage of trails required for weekend camping trips, adequate destinations, and other factors. We ask that motorized recreationists be adequately queried as part of the site-specific evaluation process and that the site-specific conditions that they identify be considered as required by the Final OHV Rule.

Response 7-81: In the FEIS, Section 3.2 – Transportation System describes the methodology used by the Forest Service to inventory and document authorized and unauthorized routes. The system of non-motorized trails was not included in this analysis unless a change was proposed to convert the trail to motorized use or convert a motorized route to a non-motorized trail. In response to the U.S. District Court order, the agency initiated additional inventory of illegal user-created routes and its methodology within the draft SEIS (See Section 3.2.2 – Existing Condition. Section 3.7 – Recreation discusses types of motorized and non-motorized recreation, including results of the National Visitor Use Monitoring study showing the popular recreation activities. Chapter 4 discloses the environmental effects across the range of Alternatives. While the Forest Service did not specifically query motorized recreationists as part of the inventory process, the public was provided the opportunity to participate in the planning process as described in Section 1.6 – Public Involvement.

Comment 7-82: The Forest Service Travel Management Rule (<http://www.fs.fed.us/recreation/programs/ohv/final.pdf>), was presented to OHV recreationists as a "route designation" process that would designate motorized routes for the appropriate type of motorized use (motorcycle, ATV, UTV, 4x4, etc.). Some form of route designation was referred to 404 times in the final rule. The rule did not state that it would be a huge motorized closure process and it was presented and accepted by motorized recreationists on that basis. In fact, the rule specifically allows new motorized routes. The rule did not authorize or direct a massive motorized closure process. However, in actual implementation, the travel management rule is being used as a massive motorized closure tool contrary to the wording of the rule and the presentation of the rule to the public during the rule making process. Implementation of the rule has included very few new routes. Proper implementation of the travel management rule is a significant issue. We request that this evaluation carefully consider the intent of the Final OHV Rule and use it to designate existing motorized routes and create new motorized routes. We also request that this action monitor the process for any misuse of the rule.

Response 7-82: See Response 4-1 and 7-61.

Comment 7-83: The Purpose and Need for this action is to implement the Final OHV Rule. The Final OHV Rule was written to designate existing motorized routes for appropriate uses and create new motorized routes where needed. Implementation of the Final OHV Rule should not result in a massive motorized closure. The Purpose and Need for this project must follow through on the Final OHV Rule as a route designation process as it was presented to motorized recreationists during the rulemaking.

Response 7-83: See Response 4-1 and 7-61.

Comment 7-84: Our observations in the project area confirm that most visitors are out to enjoy motorized access and motorized. The Purpose and Need does not adequately address and recognize the current highly popular level of motorized access and recreation and the need for increased motorized opportunities. Therefore, the current Purpose and Need is destined to produce a decision that does not meet the needs of the public and will not be willingly accepted by the public. To avoid this disconnect, we request that the Purpose and Need for this action be written to address the significant need for motorized access and motorized recreation in the project area including adequate recognition of the positive impact on the quality of the human environment. This approach will avoid the creation of a significant issue with the process and a serious procedural deficiency in the Purpose and Need.

Response 7-84: See Response 4-1 and 7-53.

Comment 7-85: In an article on road de-commissioning (<http://www.greatfallsribune.com/article/20110824/NEWS01/108240302/National-road-trail-reme>), a Forest Service fisheries technician stated that “Fish and aquatic life are adapted to natural influxes of sediment in the spring, but too much material fills spaces in the rocks where the fish lay eggs or covers the eggs.” In order to establish this sort of impact and associate it with OHV recreation, the Forest Service must have site-specific data on natural sediment loads in a stream and site-specific data on the gradation of the sediment from trail erosion and where it ends up. Fine-grained material may wash through the system and cause virtually no impact to fish spawning beds. Any purported impact by OHV recreation without site-specific data and analysis that connects the relatively minor amounts of sediment produced by OHV recreation on critical fish habitat is pure conjecture. Motorized recreationists have been paying a significant price in the form of lost opportunities due to the lack of site-specific data and conjectures. We request that any conjectures about potential impacts be carefully evaluated and only allowed in the analysis when confirmed by actual site-specific proofs and data.

Response 7-85: See comment 4-1. The Forest Service was unable to locate the reference provided by the commenter. Chapter 4 discusses environmental effects of the Alternatives on soils, watersheds and aquatic resources. All analysis used best available data and peer reviewed literature as referenced within the draft SEIS and FEIS.

Comment 7-86: Additionally, an adequate sense of magnitude must be employed within the analysis and decision-making. For example, the total naturally occurring loss of soil from the Cibola National Forest is estimated to be on the order of 1,577 acre-feet per year (1,892,000 acres total forest area times a depth of 0.008 feet of soil loss per year). The loss associated with

OHV use is on the order of 52 acre-feet (5,200 acres of roads and trails times a depth of 0.01 feet of soil loss per year). Therefore, the soil erosion associated with OHV recreation is relatively insignificant compared to the naturally occurring erosion rate and acceptable for multiple-use lands. Moreover, there are many mitigation measures that can be employed to reduce soil erosion on roads and trails while still allowing the public to enjoy them. Other examples that should be part of the evaluation include the naturally occurring mortality rate of fish and game compared to the mortality rate associated with OHV recreation. The evaluation and disclosure to the public must include the analysis and a comparison of the magnitude of OHV impacts to naturally occurring impacts for all resource areas used to assess impacts based on site-specific data. Lack of the comparison of impacts to naturally occurring levels combined with the lack of site-specific data would be a procedural deficiency that could allow inaccurate statements and opinions due to the lack of an adequate sense of magnitude.

Response 7-86: See comment 4-1. Chapter 4 discusses environmental effects of the Alternatives on soils. All analysis used best available data and peer reviewed literature as referenced within the draft SEIS and FEIS.

Comment 7-87: Past travel plans have suffered from “confirmation bias. Confirmation bias is a tendency to favor information that confirms an individual’s or group think preconceptions or hypotheses regardless of whether the information is true (http://en.wikipedia.org/wiki/Confirmation_bias). In past travel plans only studies with negative motorized conclusions have been cited. We request that the evaluation include a broad screening of issues, information, data, opinions, and needs so that it is not based on confirmation bias and meets NEPA procedural requirements. One important component required to avoid confirmation bias is the inclusion of OHV and other motorized recreationists on the inter-disciplinary team.

Response 7-87: See Response 4-1. Chapter 1 provides a thorough discussion of the public involvement process, public comments, and identification of issues. Forest Service interdisciplinary team members representing various resource values and uses (including motorized recreation) have been involved throughout the planning process; these individuals are included in Chapter 5 – List of Preparers. Chapter 6 – Consultation and Coordination lists additional agencies, organizations, and individuals that were involved during the planning process.

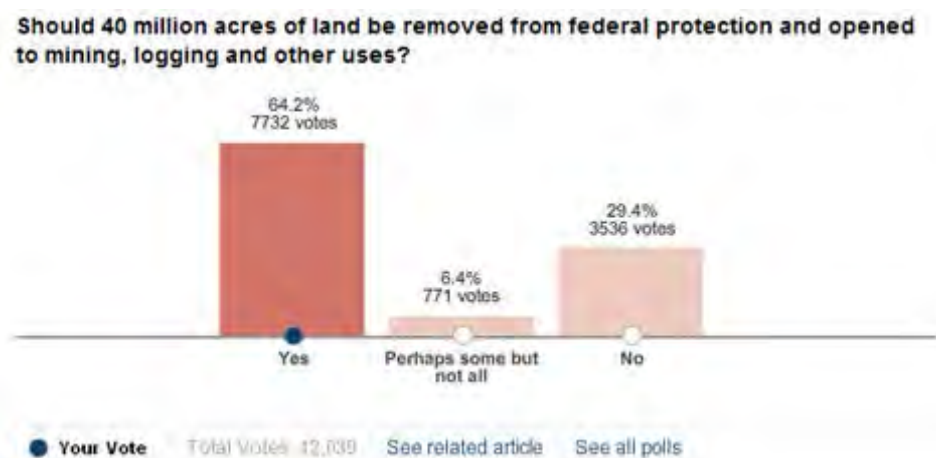
Comment 7-88: We are very concerned about what is considered natural and what is not considered natural. First, the needs of the human environment for motorized recreation should be considered part of the natural environment (as required by the original NEPA) and adequately considered in the evaluation. Secondly, massive impacts from natural events such as fires, floods, and pine beetle (we have witnessed all of them recently) are considered acceptable while relatively miniscule impacts from motorized recreation are considered unacceptable. This sort of reasoning is clearly arbitrary and capricious and we ask that the evaluation define the natural level of impacts, develop a sense of magnitude for those impacts versus motorized impacts and carefully screen out any hint of arbitrary and capricious decision-making. In order to avoid being arbitrary and capricious, all impacts must be compared to natural levels. Impacts associated with OHV recreation should not be considered significant unless they are 50% or more of the natural level.

Response 7-88: See Response 4-1 and 7-52. Section 1.3.1 Purpose and Need for the Proposed Project describes the public need for a safe and reliable system of roads and trails that provide for quality motorized and non-motorized recreation.

Comment 7-89: Motorized recreationists keep trails open for all users including motorcycle single-track trail. This issue is especially important during this period of intense downfall from trees killed by beetle infestations. A once a year trail clearing by a Forest Service trail crew is no longer adequate to keep trails open. Past closures have proven that motorized trails that have been closed to motorized use have become impassable within 3 to 5 years. Examples include the Brooklyn Bridge route in the Uintah-Wasatch-Cache National Forest and the Middle Fork of Rock Creek in the Beaverhead-Deerlodge National Forest. At the same time motorized recreationists have proven that they are willing to work to keep trails open so that all visitors are able to enjoy them. This ability to keep trails open for use by everyone is a significant advantage to designate all routes within the project area open for motorized use and this significant issue must be considered in the analysis.

Response 7-89: Comment refers to closures that are not within the Uinta-Wasatch-Cache National Forest planning area and therefore comment is not applicable.

Comment 7-90: A recent poll in the Wall Street Journal demonstrates the overwhelming support for multiple-use of our public lands.



<http://online.wsj.com/community/groups/question-day-229/topics/should-40-million-acres-land>

Response 7-90: Comment noted.

Comment 7-91: Motorized recreationists keep trails open for all users including motorcycle single-track trail. This issue is especially important during this period of intense downfall from trees killed by beetle infestations. A once a year trail clearing by a Forest Service trail crew is no longer adequate to keep trails open. Past closures have proven that motorized trails that have been closed to motorized use have become impassable within 3 to 5 years. At the same time motorized recreationists have proven that they are willing to work to keep trails open so that all

visitors are able to enjoy them. This ability to keep trails open for use by everyone is a significant advantage to designate all routes within the project area open for motorized use.

Response 7-91: See Response 4-1 and 7-55.

Comment 7-92: The positive economic benefit of OHV recreation in Montana is significant as documented by Montana Fish Wildlife and Parks in their report Montana Off-Highway Vehicles 2008 published in January 2009 (www.bber.umt.edu/pubs/survey/MT_OHV_2008.pdf). This report was prepared by James T. Sylvester, Bureau of Business and Economic Research, The University of Montana-Missoula and found that total OHV recreation expenditures by Montana residents was \$122,900,000 in 2008. OHV recreation in Utah would have similar economic magnitude. There is also a significant out-of-state expenditure that was not evaluated by this investigation. This is an especially significant issue during these tough economic times. OHV recreation based on a network of trails that attracts visitors to the area will produce a significant positive economic impact that must be given a hard look during the development of alternatives and the evaluation.

Response 7-92: See Response 4-1. Economic impacts were discussed in Chapter 3. The analysis is limited to significant issues and economics was not considered.

Comment 7-93: OHV recreationists have a strong interest in long distance routes where they can pack their camping gear with them and travel 90 to 125 miles. The concept is to camp along the way similar to the Magruder trail in Idaho (<http://fs.usda.gov/nezperce>) and cover 90 to 125 miles as part of the experience. We request that this type of opportunity be evaluated as part of the planning process and that motorized recreationists be involved.

Response 7-93: See Response 4-1. Section 2.4 – Alternatives Considered describes a range of alternatives that provide a mix of routes to meet motorized users' desire for routes long enough to meet demand. While the Forest Service did not specifically query motorized recreationists as part of the inventory process, the public was provided the opportunity to participate in the planning process as described in Section 1.6 – Public Involvement.

Comment 7-94: Most residents of Utah are 1st, 2nd, 3rd, or 4th generation residents who have been raised with motorized access to their public lands. They have driven their jeeps and motorcycles in the Uinta Wasatch Cache National Forest for decades and now many of them enjoy recreating on ATVs. This is a very important cultural issue that must be adequately considered by a travel management plan.

Response 7-94: See Response 4-1. Section 1.3.1 – Purpose and Need acknowledges the need to systematically analyze which historic and user created trails should be incorporated into the transportation system and which should be closed and rehabilitated. The impacts to historic/cultural resource are disclosed in Chapter 4.

Comment 7-95: Another significant issue that goes along with historic motorized access is associated with the way that the level of involvement in a NEPA process is used to justify motorized closures. Grandpa did not have to participate in a confusing and intimidating NEPA

process and NEPA as currently practiced is not reaching most Utah residents. Please do not interpret a lesser level of participation as acceptance of motorized closures and use it as a reason to support grant and foundation funded, non-profit non-motorized environmental groups with paid staff. The level of participation is due to the lack of an adequate public involvement program that reaches or involves the majority of residents including motorized recreationists. The project team must be interdisciplinary and include a sufficient number of motorized recreationists that are capable of relating to and understanding the needs of motorized recreationists. At the same time, the NEPA process should seek communication with motorized recreationists equal to that afforded non-motorized environmental groups. We request that the agency carefully assess this situation and implement a NEPA public involvement program that adequately compensates for these conditions and adequately identifies the significant issues and needs of motorized recreationists.

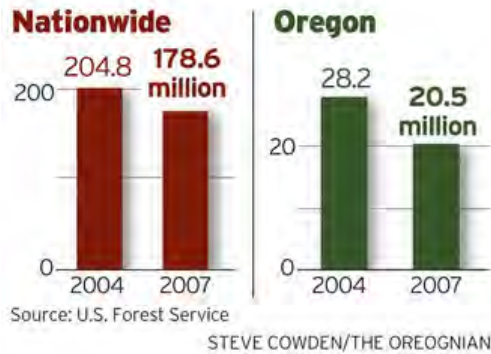
Response 7-95: See Response 4-1 and 7-87. The Forest Service conducted public participation as required under the NEPA regulations (40 CFR 1500.2(b) and (d)).

Comment 7-96: There is a significant need for Youth Loops. Youth Loops would include a small area of several acres, either contained by fencing or clearly marked boundary, with short, tight trail system that is designed to entertain kids under adult supervision. The youth loop offers an alternative to unauthorized routes near camp areas and riding in campgrounds. A good example to refer to is the Lewis and Clark National Forest Travel Plan for the Little Belts. We request that this important need be adequately addressed in the preferred alternative.

Response 7-96: See Response 4-1. The Concentrated Use Area plans in Appendix C of the FEIS describe the proliferation of OHV user trails in and around the dispersed camping areas. Many of these are created by users as kid loops.

Comment 7-97: The current trend of excessive motorized access and motorized recreational closures is having a significant impact on the number of visitors to the forest as shown in the recently released NVUM report (http://www.fs.fed.us/recreation/programs/nvum/nvum_national_summary_fy2007.pdf, <http://billingsgazette.net/articles/2008/12/04/features/outdoors/18-woods.txt>) and the following graphic based on that data. This trend has created a significant issues in regards to adequate public access and adequate motorized recreation which much be analyzed adequately during the process.

Visits to national forests have fallen off nationwide and sharply in Oregon.



Forest Service Region	National Forest Visits 2004 (000s)	National Forest Visits 2007 (000s)	Change in Visitation (000s)	% Change
01 Montana, Northern Idaho, Northeast Washington, North Dakota	13,200	11,265	-1,935	-15%
02 Colorado, Kansas, Nebraska, South Dakota, Wyoming	32,500	31,025	-1,475	-5%
03 Arizona, New Mexico	20,500	20,502	2	0%
04 Nevada, Utah, Southern Idaho	23,300	21,315	-1,985	-9%
05 California	30,700	28,702	-1,998	-7%
06 Oregon, Washington	28,200	20,495	-7,705	-27%
08 Southeastern US, Puerto Rico	31,000	25,867	-5,133	-17%
09 Northeastern US	22,500	17,033	-5,467	-24%
10 Alaska	2,900	2,421	-479	-17%
TOTAL	204,800	178,625	-26,175	-13%

Response 7-97: See Response 4-1. National Visitor Use Monitoring is a Forest wide study and was used to show popular recreation activities and use Forest wide and is not the only study cited in the FEIS and draft SEIS. As described in Chapter 4 – Environmental Effects, resource specialists on the interdisciplinary team used the best available data and peer reviewed scientific literature to analyze and draw conclusions as to the effects of implementing the Alternatives.

Comment 7-98: A motorized travel plan is a plan that specifically designates roads, trails and areas for motorized use, designates which vehicles will be allowed on which routes and if seasonal restrictions apply. A comprehensive trail designation plan does the same thing except it includes all trail uses, including mountain bike, equestrian and hiking. This is a very important distinction because the anti-access groups will attempt to convince the planning team to develop a "comprehensive" travel plan by using only the existing inventory of motorized routes. They do this by identifying existing motorized trails that are good for mountain bikes, equestrians and for bird watching... or whatever. The current approach is inequitable because it takes the current motorized route inventory and tries to make it the route inventory for all users. It leaves out possibilities for constructing or otherwise developing non-motorized trails and ignores existing non-motorized trails that exist in both the planning area and adjacent lands. Now, that doesn't mean the agency can't take into consideration the effect each alternative will have on non-motorized visitors. It can - and it should be part of the NEPA analysis. But that is totally different from specifically providing a non-motorized trail system via the existing inventory of motorized routes. We support the creation, designation and management of non-motorized trails, but not at the expense of motorized visitors. We request that the agency not use the existing motorized trail inventory for designating non-motorized trails. Instead, if there is a need for non-motorized trails, then the agency should consider options that do not reduce the existing opportunity for motorized users.

Response 7-98: See Response 4-1. Section 2.3 – Alternatives Considered and Eliminated from Detailed Analysis states the Responsible Official determined the scope of the analysis was limited to the District Transportation System for motorized vehicles.

Comment 7-99: An adequate and reasonable preferred alternative would include an adequate quantity and quality of beginning, intermediate, and advanced routes and trails for a wide cross-section of motorized visitors including motorcycles, ATVs, and four-wheel drive vehicles.

Additionally, the quantity and quality of motorized routes would be at least equal to the quantity and quality of non-motorized routes. This is the yard stick that the team should measure travel plan alternatives by.

Response 7-99: See Response 4-1 and 7-4.

Comment 7-100: Road density does not equal motorized trail density. Impact information developed based on roads should not be used to estimate impacts from ATV and single-track motorcycle trails. ATV trails has far less impact than roads in all resource areas and motorcycle single-track trails have far less impact than roads in all resource areas. Motorized trails have less impact than roads and this condition must be recognized during the analysis and decision-making.

Response 7-100: See Response 4-1, 7-4, and 7-38.

Comment 7-101: One of the specific requirements under NEPA is that an agency must consider the effects of the proposed action in the context of all relevant circumstances, such that where “several actions have a cumulative . . . environmental effect, this consequence must be considered in an EIS.” *Neighbors of Cuddy Mountain v. U.S. Forest Serv.*, 137 F.3d 1372, 1378 (9th Cir. 1998) (quoting *City of Tenakee Springs v. Clough*, 915 F.2d 1308, 1312 (9th Cir. 1990)). A cumulative effect is “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions.” 18 40 C.F.R. § 1508.7. 3. The cumulative effect of all motorized closures has been significant and is growing greater every day yet they have not been adequately addressed. Ignoring cumulative effects allows the agency to continue to close motorized routes unchecked because the facts are not on the table. CEQ guidance on cumulative effects was developed to prevent just this sort of blatant misuse of NEPA.

Response 7-101: The first Supplemental to the EIS dated September 2007 primarily addressed additional Cumulative Effects in response to an appeal. This effort was also appealed but the decision and analysis was upheld by the Appealing Officer and review team. The Ogden District Travel Plan Revision met the requirement for cumulative effects analysis.

Comment 7-102: Because of the cumulative effects on motorized recreationists from all past and reasonably foreseeable closures and the growing need for motorized access and motorized recreational opportunities, there can be no net loss of these opportunities with this action. This can be accomplished by implementing a route designation for all existing routes.

Response 7-102: We do not agree with this suggested requirement. Fortunately, the Record of Decision expands motorized opportunity on the Ogden Ranger District over the previous existing situation.

Comment 7-103:

A starting list of actions that should be evaluated in a cumulative effect analysis include:

Table of Cumulative Effects on Motorized Recreationists								
Action	Acres Affected	Miles before	Miles after	Miles closed	% closed	Mitigation of Motorized Losses	Agency	Year
Sleeping Giant BLM	7,900	29.0	21.6	7.4	25.52%	No	BLM	2004
Elkhorn Management plan	300,000			75*	50%*	No	FS	1986
Clancy-Unionville TP	33,000	136.0	108.0	28.0	20.59%	No	FS	2001
North Belts TP	250,000	370.4	164.9	205.5	55.48%	No	FS	2005
South Belts TP	83,000	173.6	140.2	34.0	19.59%	No	FS	2008
Beaverhead-Deerlodge FP	3,364,000						FS	2009
Roads		4,157.0	4,053.0	104.0	2.50%	No		
Motorized trails**		1,237.0	1,037.0	200.0	16.17%	No		
Gallatin NF TP	1,807,000						FS	2006
4x4 Roads		417.0	347.0	70.0	16.79%	No		
ATV and motorcycle trails***		680.0	145.0	535.0	78.68%	No		
Little Belt, Castle, and Crazy TP	1,050,000						FS	2007
Roads		1,546.7	740.3	806.4	52.14%	No		
ATV trails***		226.0	208.0	18.0	7.96%	No		
Motorcycle trails		658.0	443.0	215.0	32.67%	No		
Rocky Mountain Front TP	391,700						FS	2007
Motorized Trails		209.0	74.0	135.0	64.59%	No		
Badger-Two Medicine TP	130,000	190.6	8.6	180.0	94.44%	No	FS	2009
Dillon RMP BLM	901,000	2,102.0	1,342.0	760.0	36.16%	No	BLM	2004
Butte RMP BLM	307,300	629.3	416.9	212.4	33.75%	No	BLM	2009
Helena area		52.2	9.8	42.5	81.42%	No		
Blackfoot TP	376,000	**					FS	Ongoing
Divide TP	155,000	**					FS	Ongoing
Custer NF Beartooth TP	580,000						FS	2007
Roads		225.0	210.0	15.0	6.67%	No		
Motorized trails		341.0	267.0	74.0	21.70%	No		
Custer NF Ashland TP	437,000	**					FS	Ongoing
Custer NF Sioux TP	436,000	**					FS	Ongoing
Bitterroot NF TP	1,589,000	**					FS	Ongoing
Upper Missouri River Breaks RMP	378,000	592.0	404.0	188.0	31.76%	No	BLM	2008
Whitetail-Pipestone TP	185,700	679.0	406.0	273.0	40.21%	No	BLM	2007
Bruce Creek to Napa Point TP	141,990	60.0	40.0	20.0	33.33%	No	FS	2009
Keep Cool Hills Management Plan	14,500	20.0	0.0	20.0	100.00%	No	FS,FWP	2008
Owyhee Front Travel Plan BLM	484,873	834.0	398.0	436.0	52.28%	No	BLM	2009
Salmon Challis NF Travel Plan	4,359,000						FS	2009
Motorized trails		1,110.0	838.0	272.0	24.50%	No		
Tellico OHV area	6,000	39.5	24.0	15.5	39.24%	No	FS	2009
Moab RMP BLM	1,822,562	6,199.0	3,693.0	2,506.0	40.43%	No	BLM	2007
Monticello RMP BLM	1,800,000	3,069.0	2,820.0	249.0	8.11%	No	BLM	2007
Richfield RMP BLM	2,100,000	4,315.0	3,739.0	576.0	13.35%	No	BLM	2007
Greater Yellowstone Grizzly Bear Plan	5,893,000				25%*	No	FS	2006
Cabinet-Yaak-Selkirk Grizzly Plan	2,918,400	3,008.0	2,811.0	197.0	6.55%	No	FS	2008
Big Snowy Mountains TP*	150,000			100*	50%*	No	FS	2002
Targhee NF TP	1,789,000						FS	1997
Inyo National Forest TP	1,977,000	3,725.0	2,934.0	791.0	21.23%	No	FS	2009
Kootenai NF Three Rivers RD*****	638,000						FS	2009
Roads		2,222.0	500.0	1,722.0	77.50%	No		
Trails		161.0	0.0	161.0	100.00%	No		
KIPZ Forest Plan	5,513,000	**					FS	Ongoing
Lolo Forest Plan	2,083,000	**					FS	Ongoing
WMPZ Forest Plan	6,043,000	**					FS	Ongoing
Subtotal	50,494,925	39,413.3	28,343.3	11,068.7	28.08%	No		
Other Significant Measures of Closed Motorized Opportunities								
Yellowstone NP snow machines****		1400	318	1082	77.29%	No	NPS	2009
National Forest Cross Country opportunity (acres)	192,300,000	192,300,000	0	192,300,000	100%	No	FS	2005
BLM Cross Country opportunity (acres)	258,000,000	258,000,000	100,000*	257,900,000	99.40%	No	BLM	2006
All completed, ongoing and reasonably foreseeable FS Travel Plans	192,300,000	192,300,000	??	??	??	No	FS	
All completed, ongoing and reasonably foreseeable BLM RMP and Travel Plans	258,000,000	258,000,000	??	??	??	No	BLM	
Notes:								
* estimated impact								
** underway with expected significant impact								
*** additional impact associated with significant loss of quality trails and substitution with roads								
**** number of snow machines								
***** All motorized trails closed								

Response 7-103: Your table shows cumulative measures of closed routes in the areas listed. We cannot comment on the reason or rationale for closing routes in the jurisdictions referenced. In this area, we responded to the Purpose and Need addressed in the FEIS and ROD as well as the 2005 Travel Management Rule issued by the USDA Forest Service. Changing the status of some routes especially seasonal closures and administrative closures was an important option in our management of the transportation system on the Ogden Ranger District.

Comment 7-104: Past actions that have had a significant impact on motorized recreationists in Utah as shown in the table above. Reasonably foreseeable actions including travel plans, forest plans and resource management plans will produce additional significant impacts. These actions have produced or will produce a significant debt in the mitigation bank for motorized recreational opportunities in the Uinta Wasatch Cache National Forest and immediate surrounding areas and this issue must be adequately addressed.

Response 7-104: See Response 7- 101 and 7-103 addressing the cumulative impacts analysis and effects to the situation on the Ogden Ranger District.

Comment 7-105: Because of the shortage of OHV routes necessary to reasonably meet the needs of the public, every existing motorized route is extremely important.

Response 7-105: See Response 4-1 and 7-4.

Comment 7-106: All roads to be closed to full-size vehicles should be converted to atv routes. This is a reasonable alternative for all existing roads.

Response 7-106: See Response 4-1 and 7-4.

Comment 7-107: The needs of the public for motorized recreational opportunities include a variety of trails for different skill levels. Also, routes with minimal traffic are needed as practice routes for beginning riders.

Response 7-107: See Response 4-1 and 7-4. The Forest Service uses the term “diversity” to describe a variety of recreation opportunities for motorized uses.

Comment 7-108: The availability of motorized single-track trails has declined dramatically. At the same time, nearly all of the single-track trails see very little hiking or other use. It is not reasonable to segregate users on single-track trails. We can all get along and have done so for years. Sharing should be a primary goal for use of these lands. It is also consistent with the desegregation of public places as required by the Civil Rights Act of 1964. Therefore, it is a reasonable alternative to designate all existing single-track trails on multiple-use lands within the project area open to motorcycle use. Additionally, single-track challenge trails are needed for expert riders and trials type motorcycles.

Response 7-108: See Response 4-1, 7-4, 7-46, 7-48 and 7-77.

Comment 7-109: The loss of high quality motorized routes in the Uinta Wasatch Cache National Forest is not a reasonable alternative given the historic use of these routes and the needs of the public for access and motorized recreation. The proposed alternative must recognize that motorcycles can negotiate and prefer to use trails of the same specifications as hiking and pack stock trails. The proposed alternative must acknowledge that motorcycle riders are; willing to share, practice Tread Lightly, have maintained these trails for years, would rather ride their motorcycles on single-track trails and have developed the skills necessary to ride a motorcycle on single-track trails.

Response 7-109: See Response 4-1 and 7-4. Section 1.3.2.3 – Forest Plan identifies in the Forest wide Goal 8 – Enforcement, increasing the participation of individuals and organized groups in monitoring uses. Section 2.9 – Implementation list the top priorities for travel plan to improve information to the users of the National Forest.

Comment 7-110: National Forests in Idaho have a long and successful history of sharing single-track trails with motorcycles and we request that this strategy be used in the project area. . Details on the trail system in Idaho are shown by zooming in on the map at <http://www.trails.idaho.gov/>.

Response 7-110: See Response 4-1, 7-4, and 7-66.

Comment 7-111: Over 90% of the visitors to the project area are associated with multiple-use opportunities including motorized access and motorized recreation opportunities. These are multiple-use lands as designated by congress and must be managed as such. Recreation is a stated purpose for multiple-use lands.

Response 7-111: See Response 4-1, 7-1, and 7-4.

Comment 7-112: Wilderness is closed to motorized vehicles and equipment. Therefore, multiple-use lands should be open to motorized vehicles and equipment. Wilderness criteria and standards should not be applied to multiple-use lands.

Response 7-112: See Response 4-1, 7-8, and 7-81.

Comment 7-113: The site specific analysis of each road or trail to be closed must address or identify where the public would go to replace the motorized resource proposed for closure. In other words, the analysis must adequately evaluate the site specific value of a road or trail proposed for closure to motorized recreationists. It must also quantify the significant negative cumulative impact experienced when motorized recreationists could not find a trail or road with a similar experience in the area. The quality of our experience has been significantly reduced. It must also quantify the significant cumulative impact that the closure of a system of road and trails would have collectively when enough routes are closed to eliminate a good motorized day outing. An incomplete analysis is not acceptable under NEPA requirements.

Response 7-113: See Response 4-1. Chapter 4 – Environmental Effects discussed impacts to resource values and uses across the range of Alternatives. All analysis used best available data and peer reviewed literature as referenced within the draft SEIS and FEIS.

Comment 7-114: Site specific monitoring of motorized versus non-motorized use must be provided for each route as required by the National OHV Rule.

Response 7-114: See Response 4-1 and 4-3. Monitoring of the decisions made in the analysis will be done according to the strategy outlined in the draft SEIS and FEIS.

Comment 7-115: Each route must be evaluated on the basis of whether it will see more use as a motorized route or a non-motorized route and then the appropriate decision should be made on that basis.

Response 7-115: See Response 4-1, 7-4, and 7-81. The Forest Service responsible official will review the FEIS, draft SEIS, and supporting record in order to reach a decision for implementation of an alternative.

Comment 7-116: Each route must include a socio-economic analysis that includes the impacts on the public owning OHVs and looking for opportunities to use them and landowners who purchased property with the intent of being able to access and recreate using motor vehicles.

Response 7-116: See Response 4-1. Economic impacts were discussed in Chapter 3. The analysis is limited to significant issues and economics was not considered. The Revised Forest Plan ROD (2003) Standard 19 states “If the only access to National Forest requires crossing of private land where public access is restricted, the adjacent National Forest land will be closed to motorized and mechanized use without a permit authorizing motorized use.” The FEIS and draft SEIS acknowledge the interspersed of public and private lands in the planning area however the scope is limited to lands upon which the Forest Service has the authority to make decisions.

Comment 7-117: It would be a huge step backward for society if we had to comment on every foot of road, water line, sewer pipe, sidewalk, and motorized trail that the public needs. Gauging public need by the number of comments is not the norm in our society and should not be used in this process.

Response 7-117: See Response 4-1 and 7-4. Because the proposed action has the potential to significantly affect the human environment, the NEPA requires that an EIS be prepared to assess and disclose the environmental effects of the proposal and alternatives for the proposed action.

Comment 7-118: We have been keeping observations of the types of visitors in multiple-use areas since 1999 and have found that 97% of the visitors are motorized recreationists. The public comments and votes by how they use the forest, and more motorized access and recreation is what they are asking for with every visit.

Response 7-118: See Response 4-1, 7-4, and 7-118.

Comment 7-119: The travel management plan for the area must reflect that use and the needs of the public for motorized recreational opportunities in the area. Again, these are multiple-use lands and we ask that they remain viable multiple-use lands by not closing existing motorized routes.

Response 7-119: See Response 4-1, 7-4, and 7-46.

Comment 7-120: Theoretical or assumed impacts must not be used to close motorized recreational opportunities. This is happening way too often. For example, an impact on wildlife by OHV recreation is assumed on a theoretical basis but there is no site specific data or monitoring to back that statement. A similar situation is happening in other resource areas

including sedimentation and noxious weeds. Decisions to close motorized recreation must not be made on the basis of theoretical or assumed impacts to the natural environment. In order to avoid arbitrary and capricious decisions, site specific data and monitoring must be presented and demonstrate a measure significant impact.

Response 7-120: See Response 4-1. A thorough discussion of the public scoping process and issue identification is provided in Section 1.61 through 1.6.4 and on Table 1.6.1 of the draft SEIS and FEIS. As identified in Table 1.6.1, significant issues were used to develop a range of Alternatives; non-significant issues, although not used specifically to develop Alternatives, are include in the analysis and the effects are documented in Chapter 4 – Environmental Effects. As described in Chapter 4 – Environmental Effects, resource specialists on the interdisciplinary team used the best available data and peer reviewed scientific literature to analyze and draw conclusions as to the effects of implementing the Alternatives.

Comment 7-121: A sense of magnitude must be used when making decisions about road closures based on indicators such as sediment production. For example, a route should not be closed because it is estimated to produce 10 cubic yards less sediment. The sediment yield must be compared to naturally occurring conditions which includes normal runoff, floods, and fires. The recent fires in the Uinta Wasatch Cache National Forest discharged thousands of cubic yards of sediment to the area streams which is more than all of the motorized routes in the project area for the next 100 years. Another example is the assertion that groomed snowmobile trails affect the lynx. Groomed snowmobile trails cover less than 0.001% of the total area and the impact on the lynx is of a similar magnitude. Additionally, if snowmobile trails affect the lynx, then so do cross-country and snowshoe ski trails. Again, we doubt that these impact the lynx but if snowmobiles do, then so do trails packed by non-motorized uses. Quite often non-motorized impacts are equal or greater and they must be fairly assessed also.

Response 7-121: See Response 4-1, 7-35 and 7-50. As described in Chapter 4 – Environmental Effects, resource specialists on the interdisciplinary team used the best available data and peer reviewed scientific literature to analyze and draw conclusions as to the effects of implementing the Alternatives.

Comment 7-122: Confirmation of the significant magnitude of the impacts of fire versus the relatively minor impacts of recreation are further substantiated by the following article from the Uintah-Wasatch-Cache IR: *The popular Meriwether picnic area, located along the Missouri River in the Gates of the Mountains corridor, also will be closed until the area is deemed safe for public use. Following the 2007 Meriwether Fire, debris and numerous floods continue to flow through the picnic site, creating a serious safety hazard. The public docks will not be installed this year; instead, people should use Coulter campground. The Meriwether Picnic Area closure could remain in effect for several years, until hydrologic conditions improve in Meriwether Canyon. “Flash floods, as those happening at this site, occur when the ground becomes saturated with water that cannot be absorbed quickly enough,” said Mike Cole, acting Uintah-Wasatch-Cache District ranger. “Without live vegetation to absorb the precipitation up on the mountain, the water runs off and floods the picnic area.”* http://Uintah-Wasatch-Cacheir.com/news/article_633fdef8-6a1c-11df-8dcf-001cc4c002e0.html?print=1

Response 7-122: See Response 4-1. The potential for these naturally occurring events, although possible, is somewhat speculative. It would be very difficult to predict and quantify and is beyond the scope of this analysis. The Forest Service was unable to locate the reference provided by the commenter. This is not within the Uinta-Wasatch-Cache National Forest (Utah) planning area and therefore comment does not present best available pertinent data.

Comment 7-123: With respect to the position that there is not enough money to mitigate problems, motorized recreationists can work with the Forest Service as partners to obtain many different grants.

Response 7-123: See Response 4-1 and 7-55. The Revised Forest Plan (2003) page 4-112 discusses working with public and other agencies to complete trails using grants.

Comment 7-124: Motorized recreationists generate significant levels of funding that would be available if the agency would pursue them and the system was working to distribute them equitably. The magnitude of gas tax paid by OHV recreationists is significant. Fuel used for off-road motorcycle, atv and 4-wheel drive recreation in Utah is estimated at 23,890,142 gallons per year (Report ORNL/TM-1999/100, Federal Highway Administration http://www-cta.ornl.gov/cta/Publications/Reports/ORNL_TM_1999_100.pdf). Federal gas tax paid by OHV recreationists living in Utah is significant and is estimated at \$3,782,136 (\$0.184 tax per gallon times 20,555,090 gallons per year). The present worth of this annual amount over the past 30 years is over \$60,000,000.

Response 7-124: See Response 4-1, 7-55, and 7-56. The Revised Forest Plan (2003) page 4-112 discusses working with public and other agencies to complete trails using grants.

Comment 7-125: The most common maintenance requirement for 4x4 and OHV routes is the construction and maintenance of water bars/dips/mounds to divert runoff from the route. This maintenance could easily be provided by running a SWECO trail machine with a trained operator over each route once every 5 years. OHV trail maintenance and gas tax monies are available to fund this maintenance. Each region could set up a program similar to the Trails Unlimited program (<http://www.fs.fed.us/trailsunlimited/>). AmeriCorps type labor could also be used. The SWECO

could not be used on motorcycle single-track trails but they typically require less maintenance and water bars/dips/mounds can usually be constructed on these trails by hand work.

Response 7-125: See Response 4-1, 7-55, and 7-123. A SWECO was purchased specifically for trail maintenance and construction.

Comment 7-126: Many motorized clubs have trained equipment operators available to provide trail maintenance if the Agency would provide access to mini-excavators and SWECO trail machines.

Response 7-126: Comment noted. See Response 4-1. See Section 2.5.1 on the annual maintenance program. Section 1.3.2.3 Forest Plan identifies in the Forest Wide Goal 8 –

Enforcement, increasing the participation of individuals and organized groups in monitoring uses.

Comment 7-127: Where cattle grazing has established a network of cow trails, a reasonable alternative would be to allow motorcycle use on these single-track trails as there would be no change in impact or visible use of the trails.

Response 7-127: See Response 7-81. In the FEIS, Section 3.2 – Transportation System describes the methodology used by the Forest Service to inventory and document authorized and unauthorized routes. In response to the U.S. District Court order, the agency initiated additional inventory of illegal user-created routes and its methodology within the draft SEIS (See Section 3.2.2 – Existing Condition). In addition to the obvious two-track routes that were digitized, linear features were digitized if it seemed that motorized use was evident, or in some cases if access to the linear feature could be made easily from existing routes. The results of the route inventory in relation to cattle trails is disclosed in the aforementioned section.

Comment 7-128: The Stream Systems Technology Center found that installing water bars at a reasonable spacing was a very effective way to reduce the sediment discharge from trails and roads (July 2007 Stream Notes at <http://www.stream.fs.fed.us>). Many other best management practices are available to control sediment production at demonstrated by the bibliography at http://www.fs.fed.us/t-d/programs/wsa/pdfPubs/road_bmp.pdf .

Response 7-128: See Response 4-1 and 7-126. Appendix D describes Mitigation and Monitoring Best Management Practices to protect soil and water resources. The Forest Service was unable to locate the latter reference provided by the commenter.

Comment 7-129: The Uinta Wasatch Cache National Forest has far less than the desired number of motorized trails. This creates two problems. First, the public will tend to “explore” closed routes in an attempt to salvage a decent outing. Secondly, it produces an unsatisfactory OHV experience.

Response 7-129: We note your comment. The Uinta-Wasatch-Cache National Forest is a fairly large forest in acreage and located adjacent to the large population center in Utah, the Wasatch Front. Our role is to provide a broad spectrum of recreation opportunities including motorized. We realize that all citizens who participate in a particular type of recreation desires more infrastructure to support their sport of choice however, there must be a balance in order to provide for the greatest number of people.

Comment 7-130: The scope of the project must address both existing routes and new construction. This is necessary and reasonable because a certain percentage of the existing routes are likely to be closed. Putting a sideboard on the project scope that prevents the evaluation and creation of any new trail segments also eliminates the opportunity to mitigate the overall level of motorized closures. This approach, if pursued, would preclude the evaluation of a reasonable alternative and also preclude any opportunity for mitigation and enhancement. Therefore, limiting scoping of the project to existing routes only would produce a significant built-in disadvantage for motorized recreationists, i.e., the overall number of motorized routes are

destined to be reduced and nothing can be considered to enhance existing routes and to mitigate the overall loss to motorized recreationists. We are concerned that the process will not provide motorized recreationists with an equal opportunity (50/50 sharing of motorized to non-motorized trails) in the outcome and we are only destined to lose. We would appreciate an independent evaluation of this situation as soon as possible so that the proper scoping direction can be corrected early in the process.

Response 7-130: See Response 4-1. The Ogden Travel Plan FEIS which is incorporated by reference and draft SEIS describe a range of alternatives for motorized and non-motorized recreation, including new trails, based on the purpose and need. See Section 2.4 – Alternatives Considered in Detail. The effects of motorized use are described in Chapter 4. Appendix D describes Mitigation and Monitoring Best Management Practices that have been developed to reduce resource impacts.

Comment 7-131: Note that non-motorized recreationists can use routes that are both open and closed to motorized recreationists including roads and the evaluation of the opportunities available to non-motorized recreationists must be based on the total of all existing roads and trails. Additionally non-motorized recreationists can use an infinite amount of cross-country opportunity and motorized recreationists can not. A reasonable evaluation of this condition will conclude that motorized recreationists are already squeezed into insignificant and inadequate system of routes. This point must be adequately considered in the allocation of recreation resources. The FEIS and draft SEIS primarily address motorized routes during the development of a range of Alternatives for motorized and non-motorized recreation.

Response 7-131: See Response 4-1 and 7-24.

Comment 7-132: Over 50% of the public land is managed by wilderness, wilderness study area, national park, monument, roadless, non-motorized area, wildlife management, and other restrictive management criteria that eliminates most or all motorized access and motorized recreation. The Final Roadless Rule published on January 5, 2001 (http://roadless.fs.fed.us/documents/rule/roadless_fedreg_rule.pdf) specifically stated “The proposed rule did not close any roads or off-highway vehicle (OHV) trails”. The agency must honor this commitment. This commitment was recently upheld as part of appeal Number 07-05-10-0005 dated January 10, 2008 for the Smith River NRA travel management plan in the Six Rivers National Forest filed by Blue Ribbon Coalition (<http://www.sharetrails.org/releases/media/?story=556> and www.sharetrails.org/files/SmithRiverNraBrcAppealDecisionJan14.pdf). Therefore, all (100%) of the remaining public lands including roadless areas must be managed for multiple-uses in order to avoid further contributing to the excessive allocation of resources and recreation opportunities for exclusive non-motorized use.

Response 7-132: See Response 4-1, 7-4, and 5-1. The Multiple Use-Sustained Yield Act of 1960 authorized and directs the Secretary of Agriculture to develop and administer the renewable resources of timber, range, water, recreation and wildlife on the national forests for multiple use and sustained yield of the products and services. Forest Service regulations and policies are supplemental to, but not in derogation of, the purposes for which the national forests were

established. Section 1.3.2 of the FEIS and draft SEIS describes many sources that direct the management and administration of National Forest Service lands. The planning process considered the policies and regulations which the Forest Service must follow including 36 CFR Parts 212, 251, 261, and 295 – Travel Management; Designated Routes and Areas for Motor Vehicle Use; Final Rule (2005). The Forest Service was unable to locate the second and third reference provided by the commenter.

Comment 7-133: Jim Angell, the Denver-based Earth Justice attorney, says that's why it's too simplistic to liken roadless protections to those of full-blown wilderness designations - which take an act of Congress. "And it didn't bar things like oil and gas, which often takes place without the building of roads by angling the drilling from elsewhere; it didn't apply to ORV use which can continue without any stop," Angell says.

<http://www.publicbroadcasting.net/kunc/news.newsmain/article/1/0/1622248/Regional/Oral.Arguments.Heard.in.Roadless.Appeal>

Response 7-133: Roadless was identified as a key issue. The Revised Forest Plan ROD (2003) also emphasized the desire to continue to manage inventoried roadless characteristics in those areas. Moreover, protecting roadless values are important to wilderness designation. The Forest Service was unable to access the article with the link provided by the commenter.

Comment 7-134: The evaluation and decision-making must take into account that the total area of the National Forest equals 192,300,000 acres and out of that total 44,919,000 acres or 23.36% is already designated wilderness. Current forest planning actions seek to convert roadless lands to defacto wilderness even though they are designated multiple-use lands. Therefore, this percentage will be even more lopsided toward non-motorized opportunities at 53.79% assuming that 58,518 acres of roadless areas are converted to defacto wilderness areas and managed for non-motorized recreation. We maintain that the management of all of the remaining 147,381,000 congressionally designated multiple-use acres (including roadless) or 76.64% of the forest should be managed for multiple-uses. Every multiple-use acre must remain available for multiple-uses in order to meet the needs of 96.41% of the public who visit our National Forests for multiple-uses. Every reasonable multiple-use acre must remain available for multiple-uses in order to maintain a reasonable balance of opportunities. The proposed plan does not meet the basic needs of the public for multiple-use opportunities, does not provide a proper allocation of multiple-use recreation opportunities and does not meet the laws requiring multiple-use management of these lands.

Response 7-134: See Response 4-1, 5-1, 7-4, and 7-132. The Ogden Travel Plan project area does not contain any congressionally designated wilderness areas. The FEIS and draft SEIS follow the NEPA process and analyze a range of alternatives with varying effects on all resources, including roadless areas.

Comment 7-135: Basically, as shown in the table below, there is too little motorized access and too few motorized trails in the Uinta Wasatch Cache National Forest. Therefore, every mile of existing road and motorized trail is very, very important. The evaluation must adequately consider and address the fact that motorized access to the Uinta Wasatch Cache National Forest is relatively limited as shown by the miles of roads versus the number of acres in the following

table. The miles of motorized trails are exceptionally inadequate for the thousands of OHV recreationists looking for those opportunities. Additionally, the miles of motorized trails and especially single-track is way out of balance with the needs of thousands of motorized recreationists in the region surrounding the Uinta Wasatch Cache National Forest. At the same time, the miles and percentage of non-motorized trails is excessive compared to the use that they receive and this does not consider the endless cross-country opportunities that available. The total route opportunity available to non-motorized recreationists is 4609 miles and the total miles of exclusive non-motorized trails are 1526 (72.49%) and the cross-country miles are infinite. The total miles of roads open to motorized recreationists are 2321 and the total miles of trails open to motorized recreationists is 579 (27.51%) and the miles of cross-country opportunity is zero. Existing motorized single-track trails total about 324 miles or 15.39%. Note that this data is at least 8 years old and does not reflect significant motorized closures that have occurred in the last 8 years.

Given the number of motorized recreationists and the miles of routes available, it should be very obvious that motorized recreationists are already squeezed into an inadequate system of routes.

Under the existing condition, 17.54% of the Uinta Wasatch Cache National Forest is set-aside as wilderness for segregated exclusive non-motorized use for 2.55% of the visitors to the forest. The remaining 97.45% of the visits are associated with multiple-use. Multiple-use lands are public places. Segregation in public places has not been acceptable since the Civil Rights Act of 1964. In order to reasonably meet the requirements of integration a reasonable management goal for the remaining 82.46% of the forest (non-wilderness) should be for shared multiple-use that would produce a forest-wide 50/50 sharing of non-motorized/motorized trail opportunities and correct the current imbalance as shown in the table below.

The overall allocation of **existing** non-motorized versus motorized access and trail riding opportunities in the Uinta Wasatch Cache National Forest is a **does not reasonably meet** the needs of the public for motorized access and the recreational needs of motorized recreationists. We request that this data be used to guide the decision-making to a preferred alternative that adequately meets the needs of the public by **increasing motorized recreational opportunities** in the project area.

Region	Forest	District	NFS Acres	Current Status	Projected Date for Designation	Existing NFS Roads	Existing NFS Roads Open to Motor Vehicle Use	Existing NFS Trails	Existing NFS Trails Open to Motor Vehicle Use	Existing NFS Trails Open to Motor Vehicle Use (Single-Track)	Acres Currently Open to Cross-Country Motor Vehicle Use
4	UintaNF	All	880,691	System	5/7/2006	1,222	1,129	664	325	251	0
4	Wasatch-CacheNF	SaltLake	216,046	System	10/9/2006	213	212	425	69	38	0
4	Wasatch-CacheNF	Kamas	185,921	System	10/7/2006	206	201	197	53	0	0
4	Wasatch-CacheNF	nston-MtnView	405,345	System	10/7/2006	419	349	358	33	0	0
4	Wasatch-CacheNF	Ogden	160,926	System	10/6/2006	178	168	183	40	8	0
4	Wasatch-CacheNF	Logan	274,817	System	10/9/2006	266	262	278	59	27	0
		Totals	2,123,746			2,504	2,321	2,105	579	324	0
					Miles of Open Road per Square Mile =		0.93				
					Total Roads and Trails Open to Non-Motorized Use, Miles			4,609			
						Non-Motorized Trails, Miles =		1,526			
						Non-Motorized Trails, % =		72.49%			
							Motorized Trails, miles =		579	324	
							Motorized Trails, % =		27.51%		
							Trails Open to Motorcycles %			15.39%	
					http://www.fs.fed.us/recreation/programs/ohv/						
					http://www.fs.fed.us/recreation/programs/ohv/travel_mgmt_schedule.pdf						

NOTE: This data is out of date by at least 8 years and does not reflect significant motorized closures that have occurred since this table was put together.

Response 7-135: See Response 4-1, 7-4, 7-20, 7-32, 7-46, and 7-77. . Chapter 2 – Alternatives describe a variety of recreation opportunities for motorized uses, including single-track, and providing additional motorized recreation opportunities. The Ogden Travel Plan project area does not contain congressionally designated wilderness.

Comment 7-136: While we do not support segregation, if segregation is to be implemented on multiple-use lands (which must be considered public places), then a corresponding goal would be to demonstrate an absolutely perfect 50/50 sharing of non-motorized and motorized trails as part of that segregation. Therefore, if the proposed plan further promotes segregation on multiple-use lands, then it must include a corresponding 50/50 sharing and it must not tip the balance further in favor of non-motorized trails and at the expense of motorized routes.

Response 7-136: See Response 4-1 and 7-32.

Comment 7-137: It is not reasonable to reward recreationists who create and promote a culture of non-sharing on public lands.

Response 7-137: Thank you for your comment.

Comment 7-138: In order to bring equality to the allocation of non-motorized to motorized trails in the Uinta Wasatch Cache National Forest must either convert 474 miles ((2105/2)-579) of non-motorized trails to motorized trails or 947 miles (1526-579) of new motorized trail must be constructed. The Ogden Ranger District Travel Plan must adequately address this imbalance and it would be a step in the wrong direction and would create an even greater imbalance to close any existing motorized routes.

Response 7-138: See Response 4-1 and 7-32. This travel management plan is specific to the Ogden Ranger District. Travel planning for the remainder of the Uinta-Wasatch-Cache National

Forest would occur through a separate planning process. Chapter 4 – Environmental Effects describes the cumulative effects of motorized and non-motorized recreation in a larger context.

Comment 7-139: Collaboration is defined by Merriam-Webster as “to cooperate with or willingly assist an enemy of one's country and especially an occupying force”. It is not reasonable to use a collaboration process to award non-motorized interests with more non-motorized opportunities for their participation in a “collaboration process” when they already have a significant unjustified advantage in non-motorized trail opportunities when compared to motor trail opportunities (1526 miles and 72.49% non-motorized trails versus 579 miles and 27.51% motorized trails). Moreover, it is not equitable to use a process that is pre-determined to provide one group or selected group’s additional advantage with the outcome of the process when that group or groups has a significant advantage at the initiation of the process. Therefore, in order to address this inequality any collaboration efforts used in the process must be directed to address creating more motorized trails and the outcome of any collaboration efforts must be an increase in motorized trails.

Response 7-139: See Response 4-1, 7-32, and 7-87.

Comment 7-140: The following are examples of adequate OHV trail systems that should be used to guide development of this project. The alternatives for this project should be compared to these OHV trail systems. Also, it would help the project team understand the needs of OHV recreationists by visiting these areas and experiencing them on an OHV. Examples of the types of systems that should be developed in the project area include:

- a. Danskin Mountain in the Boise National Forest
(<http://www.stayontrails.com/assets/content/maps/Danskin-Mountains-map.pdf>)
- b. South Fork Boise River in the Boise and Sawtooth National Forests
- c. Winom-Frazier in the Umatilla/Whitman National Forest
- d. Prospect OHV area in the Rogue River National Forest
- e. Paiute OHV System in the Fishlake National Forest
- f. East Fork Rock (<http://www.fs.fed.us/r6/centraloregon/recreation/cohvops/efrindex.shtml>),
- g. Mendocino National Forest (<http://www.fs.fed.us/r5/mendocino/recreation/ohv/> , and
- h. High Lakes and Blue Lake Trail System in the Gifford Pinchot National Forest
(<http://www.fs.fed.us/gpnf/recreation/trailbikes/documents/trails5269small.pdf>).
- i. Canfield Trail System near Coeur d’Alene, Idaho Panhandle National Forest,
<http://www.stayontrails.com/assets/content/maps/Canfield-Butte-trail-map.pdf>
- j. In order to meet the public’s need for motorized recreational opportunities, the project area and every national forest and BLM district must have OHV systems comparable to these examples.

Response 7-140: See Response 4-1, 7-4, and 7-32.

Comment 7-141: Under the existing conditions with a typical width of no more than 12 feet, the 1913 miles of roads in the Uinta Wasatch Cache National Forest cover about 2786 acres (1913 x 5280 x 12 / 43560). At a typical width of no more than 48 inches, the 42 miles of ATV trails

cover about 20 acres. At a typical width of no more than 24 inches the 832 miles of motorized single-track trails cover 202 acres. The total Uinta Wasatch Cache National Forest is covers 2,090,000 acres. The percentage of the total forest used by roads, ATV trails, and single-track motorcycle trails under existing conditions is respectively, 0.1331%, 0.0010%, and 0.0097%. Additionally, the existing road density is 0.586 mile per square mile which is far less than the 1 mile per square mile criteria.

The total area of roads and trails under Existing Conditions far less than 1% of the project area. The total area used by motorized routes under Existing Conditions is 3578 acres or 0.1683% of the 2,126,000 acre area. Therefore, the area used Under Existing Conditions is relatively insignificant and is an entirely reasonable level of use on multiple-use lands. The reduction under the proposed action produces a significant impact on the public's ability to access and recreate and is not a reasonable level of use for lands designated for multiple-use by congress. Furthermore, a Pro-Recreation Alternative that increases motorized access and motorized recreational opportunities in the Ogden Ranger District Ranger District is an entirely reasonable alternative for these multiple-use lands.

Acres and % of Forest for Existing Motorized Routes					
Total Project Area (acres) =			2,126,000		Road Density mi/sq mi
	Miles	Feet width	Acres	% of Forest	
Miles of road	2,321.0	12	3376.00	0.1588%	
Miles of ATV	255.0	4	123.64	0.0058%	
Miles of Motorcycle	324.0	2	78.55	0.0037%	
		Total	3578.18	0.1683%	

Response 7-141: See Response 4-1, 7-32, 7-38, and 7-138

Comment 7-142: In a recent article (http://www.Uintah-Wasatch-Cacheir.com/articles/2008/08/01/national/80na_080801_drill.prt) about a lawsuit regarding drilling in New Mexico on the Otero Mesa, the BLM manager stated “While up to 90 percent of BLM lands are open to drilling under the plan, Childress said only 800 to 900 acres of Otero Mesa’s 1.2 million would be permanently disturbed by roads, footpads and other drilling related activities. “I think that’s a pretty reasonable percentage,” he said.” We agree and find that this is a relatively insignificant percentage of the total area and quite acceptable management for multiple-use lands.

Response 7-142: Thank you for your comment. The Forest Service was unable to access the article with the link provided by the commenter.

Comment 7-143: National OHV criteria and standards are not entirely applicable to conditions in the Uinta Wasatch Cache National Forest project area and Utah, i.e. one size does not fit all. The analysis needs to allow for judgment on site specific conditions so that the decision is a

better match for local conditions and customs which center on motorized access and motorized recreation.

Response 7-143: See Response 4-1 and 7-32.

Comment 7-144: The evaluation must adequately consider the growing popularity of motorized recreation, the aging population and their needs for motorized access, and the increased recreation time that the aging population has and looked forward to enjoying public lands in their motor vehicles.

Response 7-144: See Response 4-1 and 7-32. The FEIS and draft SEIS disclose the impacts of the alternatives on recreationists and motorized use in Chapter 4 – Environmental Effects.

Comment 7-145: Specific references from the new National OHV Policy that must be adequately addressed include:

Existing – The unit or district restricts motor vehicles to “existing” routes, including user-created routes which may or may not be inventoried and have not yet been evaluated for designation. Site-specific planning will still be necessary to determine which routes should be designated for motor vehicle use.

For many visitors, motor vehicles also represent an integral part of their recreational experience. People come to National Forests to ride on roads and trails in pickup trucks, ATVs, motorcycles, and a variety of other conveyances. Motor vehicles are a legitimate and appropriate way for people to enjoy their National Forests—in the right places, and with proper management.

To create a comprehensive system of travel management, the final rule consolidates regulations governing motor vehicle use in one part, 212, entitled “Travel Management.” Motor vehicles remain a legitimate recreational use of NFS lands.

This final rule requires designation of those roads, trails, and areas that are open to motor vehicle use. Designations will be made by class of vehicle and, if appropriate, by time of year. The final rule will prohibit the use of motor vehicles off the designated system, as well as use of motor vehicles on routes and in areas that is not consistent with the designations. The clear identification of roads, trails, and areas for motor vehicle use on each National Forest will enhance management of National Forest System lands; sustain natural resource values through more effective management of motor vehicle use; enhance opportunities for motorized recreation experiences on National Forest System lands; address needs for access to National Forest System lands; and preserve areas of opportunity on each National Forest for nonmotorized travel and experiences.

Clearly the rule intended to identify existing routes being used for motorized access and recreation and preserve existing non-motorized routes by elimination of cross-country travel. Why is a process that was intended to eliminate cross-country travel and designate existing motorized routes been allowed to turn into a massive closure process?

Additionally, the rule preserves existing non-motorized routes by not allowing them to be converted to motorized routes and it does not state anywhere that non-motorized travel and experiences were to be significantly enhanced by a wholesale conversion of motorized routes to non-motorized routes. We request that the intention of the final OHV Route Designation rule be followed by the Ogden Ranger District Travel Plan decision and that the rule not be used inappropriately as an action to create wholesale motorized closures and a wholesale conversion of motorized to non-motorized routes.

Response 7-145: Thank you for your comment. The Forest Service was unable to locate the specific reference provided by the commenter. The draft SEIS and FEIS are consistent with the National Travel Management Plan Final Rule (2005).

Comment 7-146: In order to be responsive to the needs of motorized recreationists, the plan should specifically allow for amendments as required to create new trails, connect trails to create motorized loops, extend trails, make minor boundary adjustments to allow a motorized trail, etc.

Response 7-146: See Response 4-1. Section 1.4 discloses that no Forest Plan amendment would be required by any of the Alternatives.

Comment 7-147: Forest Service and BLM law enforcement has taken the position that OHVs cannot legally ride on forest or BLM roads unless the road is designated dual-use. Cumulative decisions have closed OHV trails to the point that there is not an inter-connecting network of routes. At the same time, the agencies have not designated a functional network of dual-use routes to inter-connect to OHV routes. Dual-use is essential for the family OHV experience. Therefore, these closure decisions are forcing the OHV recreationists to ride non-designated dual-use routes illegally. The proposed action must include these designations in order to provide a network of OHV routes with inter-connections, where required, using dual-use roads in order to be functional. This will allow OHV enthusiasts to operate legally on forest and BLM roads. We request that a system of dual-purpose roads, and OHV roads and trails that interconnect be one of the primary objectives of the travel management plan and that this objective be adequately addressed in the document and decision. The issue of speed can be adequately and easily addressed by specifying maximum speeds and signing. Without the dual-use designation, the proposed action would transform family OHV trips from a healthy family oriented recreation to an illegal activity. This is not a reasonable nor acceptable outcome.

Response 7-147: It is unclear what the commenter intends with the term “dual use.” Chapter 2 describes a transportation network across a range of alternatives for various types of motorized recreationists uses (e.g., roads, routes, trails, ATV, motorcycle). Section 2.5.5 – Mixed Use Analysis discusses designation of certain roads and trails for dual or mixed use and how Maintenance levels (2, 3, and 4) related to speed and traffic. In the FEIS, Section 3.2 – Transportation System describes the methodology used by the Forest Service to inventory and document authorized and unauthorized routes. In response to the U.S. District Court order, the agency initiated additional inventory of illegal user-created routes and its methodology within the draft SEIS (See Section 3.2.2 – Existing Condition). Appendix D – Mitigation and Monitoring describes a functional signing program and necessary to reduce the impacts from inappropriate and illegal public uses.

Comment 7-148: The continual closure of motorized trails has forced OHVs to be operated on forest roads in order to provide a reasonable system of routes and to reach destinations of interest. The lack of dual-use designations on forest roads then makes OHV use on these routes illegal. The cumulative negative effect of motorized closures and then combined with the lack of a reasonable system of roads and trails with dual-use designation have not been adequately considered in past evaluations and decision-making. We request that all reasonable routes be designated for dual-use so that a system of roads and trails can be used by motorized recreationists. Additionally, we request that the cumulative negative effect of all past decisions that have adequately considered dual-use designations be evaluated and considered in the decision-making and that this project include an adequate mitigation plan to compensate for inadequate consideration in the past.

Response 7-148: See comment 1-147. Section 4.14 discloses the information regarding the cumulative effects analysis. Past, present, and reasonably foreseeable future actions are listed first, then each action (or group of actions) and the associated cumulative effects are discussed as applicable for each resource in the succeeding sections.

See Response 4-1. Section 2.8 – Mitigation briefly describes the guidance. Appendix D describes Mitigation and Monitoring Best Management Practices that have been developed to reduce resource impacts.

Comment 7-149: In many cases illegal trails are created in response to the lack of adequate motorized opportunities. If there were an adequate number of OHV trail systems, then the need to create illegal trails would be greatly diminished. Therefore, the catch-22 of the closure trend is that in the end it feeds the illegal activity. In other words, it would be a more advantageous and equitable situation to pro-actively manage motorized recreation.

Response 7-149: See comment 7-147. Section 1.3.1 Purpose and Need describes the public need for a safe and reliable system of roads and trails that provide for quality motorized and non-motorized recreation. It also indicates the need to address the dramatic increase in demand for motorized recreational experiences. The FEIS and draft SEIS describe a range of alternatives for motorized trail access. Section 2.4 – Alternatives Considered in Detail include actions on those trails analyzed in these documents. Having a clearly defined travel plan would allow the Ogden Ranger District to concentrate efforts on closing illegal routes. Unauthorized use of roads and trails and creation of illegal trails by OHVs is acknowledged in Chapter 3 Affected Environment and Chapter 4 Environmental Effects.

Comment 7-150: The Forest Service has only addressed less motorized access and less motorized recreational opportunities. The alternatives formulation and decision-making must adequately recognize and address the fact that the majority of the public visiting the project area want more motorized access and motorized recreational opportunities.

Response 7-150: The FEIS and draft SEIS describe a range of alternatives for motorized trail access. Section 2.4 – Alternatives Considered in Detail include actions on those trails analyzed in these documents.

Comment 7-151: The existing level of motorized access and recreation cannot be dismissed because it is only associated with the No Action Alternative. The existing level of motorized access and recreation is reasonable alternative and an alternative other than No Action must be built around it.

Response 7-151: See Response 4-1 and 7-32. See the draft SEIS and FEIS for clarification of analysis for the change in the types of motorized and non-motorized travel. The theme of Alternative 2 was to improve and provide additional motorized recreation opportunities.

Comment 7-152: The Ravalli County Off-Road Users Association has found that “at the end of 2006, there were approximately 2500 “stickered” OHV’s in Ravalli County. For the past five years, the growth rate of “stickered” OHV’s has been about 20% per year. If this growth rate continues, the number of OHV’s in the forest will double every four years. On the Bitterroot National Forest there have been no new OHV “system” routes designated for OHV travel since 1996. History, experience and common sense tell us that when adequate, responsible, sustainable routes with attractive destinations are provided, OHV enthusiasts will ride responsibly. On the Bitterroot National Forest this means more routes, not more restriction.” The same analysis must be done for the Uinta Wasatch Cache National Forest and it will find the same no growth trend and a lack of an adequate number of existing routes that is further made worse by a lack of new routes to address growth.

Response 7-152: See Response 4-1, 7-32, and 7-97. The demand for new motorized routes is an assumption made based on the increased ownership of ATVs in northern Utah

Comment 7-153: It is not environmentally and socially responsible to squeeze motorized recreationists into the small possible numbers of areas and routes, yet this is the goal being pursued by the Uinta Wasatch Cache National Forest. There is also a significant public safety aspect associated with squeezing everyone into a small area as accidents will increase with too many motorized recreationists on too few routes. We request that these significant issues be adequately addressed.

Response 7-153: See Response 4-1 and 7-32. The route designation decisions were based on a broad variety of issues, including safety. The issue of safety was not identified as a significant issue in the analysis.

Comment 7-154: Motorized recreationists endorsed and accepted millions of acres of area restriction under the the Travel Management; Designated Routes and Areas for Motor Vehicle Use, Final Rule (<http://www.fs.fed.us/recreation/programs/ohv/final.pdf>) as a positive action to control environmental impacts. We accepted area restriction and not area closure. Area closure is permanent. Area restriction allows flexibility as needed to address site specific conditions. Each motorized road and trail exists because it serves some multiple-use need. Every road and trail is important to some individual for some purpose. Each motorized road and trail must have adequate site-specific analysis to determine all of its values including motorized recreational value. Motorized recreationists gave up 97% of the area historically available to them under both the 3-State ROD and the National Route Designation rule as the ultimate act of mitigation so that

we would continue to have use of existing motorized routes that cover or provide access to an area estimated at less than 3% of the total area. Now motorized recreationists have been given almost no credit for our cooperation during that action and we have only been penalized for our past cooperation by current route designations, resource management plans, forest plans and travel plans that seek to close 50% to 75% of the existing motorized routes. This outcome was not part of the 3-State OHV and National Route Designation agreement and this level of closure is not acceptable to us for that reason. The 3-State OHV and National Route Designation agreements were not made with the intention of massive closures beyond that agreement. We ask that all BLM and Forest Service actions include proper recognition of the agreement behind the 3-State OHV and National Route Designation decisions which allow continued use of the existing networks of motorized roads and trails without massive motorized closures.

Response 7-154: Development of the Ogden Travel plan follows the NEPA process and analyzes a range of alternatives. The analysis has considered the policies and regulations which the Forest Service must follow including 36 CFR Parts 212, 251, 261 and 295. Public comment has been an integral part of identifying issues, routes, and development of alternatives. An inventory was completed by Forest Service personnel that verified and mapped existing designated classified routes and unclassified abandoned and user created routes. The Recreation Opportunity Spectrum describes the potential of both non-motorized and motorized experiences within a defined area in relationship to types of activities that are occurring. Decisions on the ROS were made in the Revised Forest Plan EIS. The Forest Service recognized that the ROS would be dynamic as a guideline and could potentially change as travel management direction was changed. The Forest Service was unable to locate information regarding the 3-State OHV ROD provided by the commenter.

Comment 7-155: The typical use of public lands and the typical needs of the public in our region are described on Table 2-7 in the Social Assessment of the Beaverhead-Deerlodge National Forest dated October 2002 (http://www.fs.fed.us/r1/b-d/forest_plan/revision/reports_documents/social/Forest%20Social%20Assessment%20Masterfinal%20.pdf). This document reported that the total number of forest visitors in Forest Service Region 1 for year 2000 was 13,200,000. The total number of wilderness visits was estimated at 337,000 or 2.55%. Therefore, millions of visitors to public lands (nearly all at 97.45%) benefit from management for multiple-use and benefit from motorized access and mechanized recreational opportunities which are consistent with our observations of visitors enjoying motorized access and mechanized recreation on public lands.

The agency has overlooked one important aspect of the visitor use data. The visitor use data cited above is based on a percent of the total population. However, the percent of the total population visiting our public lands is a fraction of the total population. Public lands should be managed for those people that actually visit them. We request that this adjustment be made in this evaluation.

The total number of individuals that visit our national forests is about 56 million (personal communication Don English, National Visitors Use Monitoring Program, Forest Service, November 29, 2005). Our total U.S. population is about 286 million (2000 Census Data). Therefore, only about 20% (56 million/286 million) of the total U.S. population actually visits

our national forests. This number needs to be used as the denominator (baseline) for total forest visitors.

Forest Service Chief Dale Bosworth recognized the true popularity and magnitude of motorized recreation in his January 16, 2004 speech which stated “Off-highway vehicles, or OHVs, are a great way to experience the outdoors. But the number of OHV users has just gotten huge. It grew from about 5 million in 1972 to almost 36 million in 2000.” We agree with the Forest Chief that 36 million is a significant number of recreationists. Additionally, the USDA Southern Research Station has recently validated the growing popularity of OHV recreation in their Recreation Statistics Update Report No. 3 dated October 2004

(<http://www.srs.fs.usda.gov/trends/RecStatUpdate3.pdf>). This document reports that the total number of OHV users has grown from 36 million to 49.6 million or 38% by the fall 2003/spring 2004. Based on the 2000 estimates OHV and motorized recreationists are about 64% of the population that actually visits the forest (36 million / 56 million).

This is further substantiated on page 9 of a report prepared by National Survey on Recreation and the Environment (NSRE 2000) titled Outdoor Recreation Participation in the United States (<http://www.srs.fs.usda.gov/trends/Nsre/summary1.pdf>) which asks the question “During the past 12 months. Did you go sightseeing, driving for pleasure or driving ATVs or motorcycles?” The percent responding “Yes” was 63.1% and the total number in millions was estimated at 130.8 million. Additionally, NSRE is often referenced by the agency but the summary statistics are skewed against motorized recreation because driving for pleasure and OHV use are split out as separate groups. These two groups represent motorized recreation and if they are added together they are as large as any other group in the survey which correctly demonstrates the magnitude of motorized recreation.

Additionally, the Southern Research Station in their report Off-Highway Vehicle Recreation in the United States, Regions and States (http://www.fs.fed.us/recreation/programs/ohv/OHV_final_report.pdf) determined that of the total U.S. population in the West 27.3% participated in OHV recreation and that out of the total population in Utah 31.% participated in OHV recreation. It appears that the study is diluting the actual percentage of OHV recreationists by using total population and not the population actually visiting and using the forest. As discussed above only 20% of the total U.S. population visits the forest. The percentage of Utah residents that actually visit our national forests is higher than the national average and is estimated at ½ of the total state population. Based on this estimate, it is our opinion that about 62% (31.1% x 2) of the actual visitors to Utah national forests participate in OHV recreation.

These surveys and data demonstrates the significant popularity of motorized and OHV recreation and the tremendous public support and need for motorized and OHV recreational opportunities. We maintain that motorized recreationists are the main group of visitors out of the total population of visitors to the national forest visiting the forest 5 or more days per year. The needs and support of motorized recreationists must be adequately addressed in this planning effort by preserving all reasonable existing motorized recreational opportunities. This planning effort must also adequately address the increasing popularity by creating new motorized recreational opportunities.

Response 7-155: See Response 4-1, 7-4, 7-32, and 7-163. The Forest Service was unable to access the articles with the second and third links provided by the commenter.

Comment 7-156: The Southern Research Station in their report Off-Highway Vehicle Recreation in the United States, Regions and States (http://www.fs.fed.us/recreation/programs/ohv/OHV_final_report.pdf) determined that out of the total population in Utah 31.1% participated in OHV recreation. The U.S. census determined that the population in 2010 was 2,763,885 (<http://quickfacts.census.gov/qfd/states/30000.html>). Therefore, the number of OHV recreationists in Utah is at least $2,763,885 \times 0.335 = 859,568$.

Response 7-156: See Response 4-1, 7-4, 7-32, and 7-163.

Comment 7-157: The Southern Research Station in their report Off-Highway Vehicle Recreation in the United States, Regions and States (http://www.fs.fed.us/recreation/programs/ohv/OHV_final_report.pdf) determined that out of the total population in Utah 31.1% or 490,000 individuals participated in OHV recreation. These numbers demonstrate the immense popularity of OHV recreation. These numbers demonstrate that there are not enough existing motorized recreational opportunities. These numbers demonstrate that the agency's motorized closure trend is contrary to the needs of the public. The magnitude of the number of motorized recreationists is real. The misrepresentation of visitor numbers must be discontinued. Proper emphasis must be given to motorized recreation. Additionally, the agency must understand and accept that many motorized recreationists do not participate in the NEPA process. Therefore, the agency should not be driven by the number of perceived participants and comments received. As originally envisioned and stated in law, the NEPA process should be driven by issues and needs and motorized recreationists have significant issues and needs. Motorized recreationists believe and hope that the Forest Service as a public agency will look out for their issues and needs in an even-handed way. In other words, as the process works now, the needs of largely unorganized motorized interests including individuals and families are largely ignored. The agency must not be overly influenced by organized non-motorized groups and their significant lobbying, organized comment writing and legal campaigns. The agency must adequately emphasize the needs of lesser organized and funded motorized recreationists by developing a motorized travel plan that addresses the needs associated with the numbers and popularity of at least 490,000 motorized and OHV recreationists.

Response 7-157: See Response 4-1, 7-4, 7-32, 7-95, and 7-163.

Comment 7-158: The current allotment of recreation resources on all Forest Service lands is way out of balance with 44,919,000 acres out of 192,300,000 acres or 24% in wilderness designation while no more than 2.55% of the visitors are wilderness visitors. Designation as wilderness is further out of touch with the needs of the public because recreation is not a stated purpose of the wilderness act and, therefore, recreation in wilderness area can not and should not be emphasized. Note that we could oppose any recreation development in wilderness areas in retaliation to non-motorized groups that go after our recreation opportunities but we have chosen

not to do so. Recreation is a stated purpose in the multiple-use laws and, therefore, should be emphasized in the purpose and action.

Response 7-158: Comment noted. There are no congressionally designated wilderness areas within the Ogden Travel Plan project area and therefore comment is not pertinent.

Comment 7-159: If Roadless acres are included in this total, it becomes even more unbalanced with a total of 103,437,000 acres or 54% in wilderness or roadless designation while only 2.55% of the visitors are wilderness visitors.

Response 7-159: See Response 4-1. Because roadless was identified as a key issue the Ogden Travel Plan FEIS analyzed the effects to roadless characteristics over a range of alternatives. The Revised Forest Plan ROD (2003) emphasizes the desire to continue to manage inventoried roadless characteristics in those areas. See key issues and Alternative development in Chapter 1 and 2 of the FEIS.

Comment 7-160: The evaluation must adequately consider and address the fact that motorized access to the national forest is relatively limited as shown by the miles of roads versus the number of acres in the following table. The miles and percentage of non-motorized trails is excessive compared to the use that they receive and this does not consider the endless cross-country opportunities that are available to non-motorized recreationists. The total route opportunity available to non-motorized recreationists is 510,575 miles, the total miles of exclusive non-motorized trails are 93,088 or 75% of the existing total. The miles of non-motorized cross-country opportunity are infinite.

Response 7-160: See Response 4-1, 7-32 and 7-97. Impacts are described in Chapter 4 – Environmental Effects and supported by pertinent and peer reviewed literature.

Comment 7-161: The total miles of roads open to motorized recreationists are 286,445 and the total miles of trails open to motorized recreationists are 31,853 or 25% of the existing total. The cross-country miles are or will be shortly equal to zero. Therefore, the overall allocation of non-motorized versus motorized access and trail riding opportunities in the national forest system is way out of balance with the needs of the public for motorized access and the recreational needs of motorized recreationists.

Furthermore, we request that the data in the next two tables be updated to reflect the significant reduction in miles of roads and motorized trails that decisions have produced since this data was assembled. This revised data should be used to guide the decision-making to forest plan and travel plan alternatives that adequately meet the needs of the public by increasing motorized recreational opportunities in the national forest system.

Region	Forest	District	NFS Acres	Current Status	Projected Date for Designation	Existing NFS Roads	Existing NFS Trails	Existing NFS Trails Open to Motor Vehicle Use	Existing NFS Trails Open to Motor Vehicle Use (Single-Track)	Currently Open to Cross-Country Motor Vehicle Use	Acres
4	Ashley	All	1,383,347	Existing	12/8/2006	1,639	384	1,218	256	0	0
4	Boise	Mtn Home	660,700	Existing	1/8/2006	757	590	377	355	355	0
4	Boise	IdahoCity	354,000	Existing	1/9/2006	1,541	1,203	208	163	163	0
4	Boise	Lowman	486,800	System	12/6/2006	868	687	229	143	143	0
4	Boise	Cascade	423,500	System	12/6/2006	626	589	222	196	196	0
4	Boise	Emmett	346,600	Existing	11/9/2006	1,017	656	164	109	109	0
4	Bridger-Teton	Kemmerer	284,000	Existing	10/9/2006	220	220	383	0	0	0
4	Bridger-Teton	BigPiney	437,000	Open	10/7/2006	360	260	352	26	15	55,300
4	Bridger-Teton	GreysRiver	482,000	Existing	10/9/2006	484	388	601	105	96	0
4	Bridger-Teton	Jackson	687,000	Open	10/8/2006	303	217	693	44	20	88,945
4	Bridger-Teton	Buffalo	720,000	Open	10/8/2006	186	171	536	22	0	63,800
4	Bridger-Teton	Pinedale	828,000	System	10/7/2006	550	545	733	25	0	0
4	Targhee	All	1,789,046	Existing	12/8/2006	1,898	1,588	1,257	530	0	0
4	Caribou	All	1,042,200	System	5/7/2006	1,348	885	1,434	796	147	0
4	Curlew	All	47,000	Existing	10/9/2006	116	92	0	0	0	0
4	Dixie	All	1,883,734	Open	12/6/2006	3,802	3,370	1,547	325	10	1,150,112
4	Fishlake	All	1,461,228	Open	3/7/2006	1,967	1,937	1,208	411	0	783,842
4	Manti-LaSal	Ferron	323,275	System	11/7/2006	490	461	168	108	33	0
4	Manti-LaSal	Moab	168,182	Open	11/8/2006	381	303	68	1	0	34,975
4	Manti-LaSal	Monticello	365,933	System	11/7/2006	652	482	269	118	30	0
4	Manti-LaSal	Price	234,092	System	11/7/2006	224	212	215	39	10	0
4	Manti-LaSal	Sanpete	248,563	System	11/7/2006	485	445	178	95	0	0
4	Humboldt-Toiyabe	Carson	378,580	System	9/9/2006	2,164	2,164	239	7	7	0
4	Humboldt-Toiyabe	Bridgeport	1,037,984	Open	9/9/2006	1,365	1,365	204	0	0	843,600
4	Humboldt-Toiyabe	SpringMtnNRA	314,448	System	9/7/2006	554	554	104	50	0	0
4	Humboldt-Toiyabe	Austin/Tonopah	2,123,244	Open	9/9/2006	3,784	3,784	439	60	0	1,409,000
4	Humboldt-Toiyabe	Ely	1,102,425	Open	9/9/2006	2,672	2,672	204	53	0	905,700
4	Humboldt-Toiyabe	MountainCity	479,285	Open	9/9/2006	1,085	1,085	55	45	0	479,285
4	Humboldt-Toiyabe	Mtns/Jarvis	624,908	Open	9/9/2006	2,171	2,171	564	119	0	370,600
4	Humboldt-Toiyabe	SantaRosa	273,732	Open	9/8/2006	624	624	65	29	0	241,700
4	Payette	All	1,529,042	Open	10/6/2006	3,044	1,702	1,152	640	578	532,345
4	Salmon-Challis	All	4,359,200	Open	9/9/2006	3,923	2,739	2,905	1,436	1,436	1,017,463
4	Sawtooth	SawtoothNRA	770,132	System	7/8/2006	423	384	873	168	168	0
4	Sawtooth	Minidoka	636,868	Open	5/7/2006	1,133	1,020	412	164	130	611,162
4	Sawtooth	Ketchum	328,352	Open	5/7/2006	154	129	385	147	139	76,820
4	Sawtooth	Fairfield	415,711	Open	5/7/2006	203	173	537	395	395	217,784
4	UintaNF	All	880,691	System	5/7/2006	1,222	1,129	664	325	251	0
4	Wasatch-CacheNF	SaltLake	216,046	System	10/9/2006	213	212	425	69	38	0
4	Wasatch-CacheNF	Kamas	185,921	System	10/7/2006	206	201	197	53	0	0
4	Wasatch-CacheNF	Inston-MtnView	405,345	System	10/7/2006	419	349	358	33	0	0
4	Wasatch-CacheNF	Ogden	160,926	System	10/6/2006	178	168	183	40	8	0
4	Wasatch-CacheNF	Logan	274,817	System	10/9/2006	266	262	278	59	27	0
		Totals	31,153,857			45,717	38,572	22,303	7,759	4,504	8,882,433
					Miles of Open Road per Square Mile =	0.84					
					Total Roads and Trails Open to Non-Motorized Use, Miles		68,020				
					Non-Motorized Trails, Miles =		14,544				
					Non-Motorized Trails, % =		65.21%				
					Motorized Trails, miles =		7,759		4,504		
					Motorized Trails, % =		34.79%				
					Trails Open to Motorcycles %				20.19%		

<http://www.fs.fed.us/recreation/programs/ohv/>
http://www.fs.fed.us/recreation/programs/ohv/travel_mgmt_schedule.pdf

NOTE: This data is out of date by at least 8 years and does not reflect significant motorized closures that have occurred since this table was put together.

Response 7-162: See Response 4-1, 7-32 and 7-97, and 7-160.

Comment 7-163: Additionally, specific NVUM data for the Uinta Wasatch Cache National Forest shows that there were 8,114,000 total site visits to the forest and only 207,000 wilderness visits (http://www.fs.fed.us/recreation/programs/nvum/revised_vis_est.pdf). Therefore, wilderness visits in the Uinta Wasatch Cache National Forest are 2.55% of the total visits yet past decisions in Region 4 and the proposed plan by the Uinta Wasatch Cache National Forest

have produced both a disproportionately large and an increased number of recreation opportunities for non-motorized and wilderness visitors and at the expense of the multiple-use and motorized visitors. The remaining 97.45% of the visitors are associated with multiple-uses. The public comments and votes by how they use the forest, and more motorized access and recreation is what they are asking for with every visit regardless of whether they provide comments in a cumbersome NEPA process.

Response 7-163: See Response 4-1, 7-4, 7-32, 7-61, and 7-97.

Comment 7-164: As demonstrated by Table 3, the ratio of acres available to wilderness/non-motorized visitors versus the acres available to multiple-use visitors is way out of balance in the existing condition with 1.80 acres per wilderness visitor and 0.22 acres per multiple-use visitor for a ratio of about 8:1. The proposed management of roadless areas as defacto wilderness areas would make this inequity even worse by providing 7.24 acres per wilderness visitor and 0.08 acre per multiple-use visitor for a ratio of about 91:1.

The available multiple-use (MU) acres and acres per MU visitors is less than this example because even though lands are designated as MU by congress the agency is effectively managing many multiple-use acres as non-motorized/defacto wilderness. Therefore, the acres per MU visitor is significantly less than shown and the imbalance of the ratio of defacto wilderness acres per visitor to MU acres per visitor is significantly greater than this example.

Table 3 Acres per Forest Visitor and Ratio

Total Annual Forest Visitors =	8,114,000
Wilderness Visitors =	207,000
Multiple-use Visitors =	7,907,000
Forest Acreage =	2,126,000
Existing Wilderness Acreage =	373,000
Existing Multiple-use Acreage =	1,753,000
Proposed Defacto Wilderness Acreage =	1,126,000
Total Proposed Defacto Wilderness =	1,499,000
Total Proposed Multiple-use Acreage =	627,000
Existing Acres/Wilderness Visitor =	1.80
Proposed Acres/Wilderness Visitor =	7.24
Percent Increase =	302%
Existing Acres/Multiple-use Visitor =	0.22
Proposed Acres/Multiple-use Visitor =	0.08
Percent Decrease =	-64%
Existing Ratio of Defacto Wilderness to MU Acres per Visitor	8.13
Proposed Ratio of Defacto Wilderness to MU Acres per Visitor	91.32
Note 1: Total Proposed Defacto Wilderness includes all Roadless Areas which the Agency is inappropriately managing as non-motorized.	
Note 2: The available multiple-use (MU) acres and acres per MU visitors is less than this example because even though lands are designated as MU by congress the agency is effectively managing many multiple-use acres as non-motorized/defacto wilderness. Therefore, the acres per MU visitor is significantly less than shown and the imbalance of the ratio of defacto wilderness acres per visitor to MU acres per visitor is significantly greater than this example.	

Response 7-164: See Response 4-1, 5-1, 7-29, and 7-32.

Comment 7-165: We recognize the desire for a quiet experience in the forest as a legitimate value. To varying degrees, we all visit the forest to enjoy the natural sounds of streams, trees, and wildlife. Forest visitors who require an absolutely natural acoustic experience in the forest should be encouraged to use the portions of the forest which have been set aside for their exclusive benefit where they are guaranteed a quiet experience, i.e, wilderness areas. Given the demonstrated underutilization of existing wilderness areas, it is entirely reasonable to conclude that there is adequate wilderness area. Given that vast areas of our forests have been set aside for

the exclusive benefit of this relatively small group of quiet visitors, it is not reasonable to set aside more areas and trails for their needs.

Response 7-165: See Response 4-1 and 7-26. The Ogden Travel Plan project area does not contain congressionally designated wilderness.

Comment 7-166: In addition to the studies cited above, we have observed that 97% of the visitors to multiple-use areas are enjoying multiple-use activities based on motorized access and motorized recreation as shown in Table 1.

Table 1

TOTAL ANNUAL OBSERVATIONS ON MULTIPLE-USE PUBLIC LANDS										24-Dec-13
Date	Motorized Access Vehicles (Note 1)	OHV/Snow	FWD/Woodc	MTN Bike	Equestrian	X-C Skiers	Hikers / Runners	General Area/Comment	Vehicles at Hiking Trailhead (Note 2)	National Forest
1999	5	342	37	11	10	0	25	See specific years and notes below	0	
2000	11	223	49	26	3	7	15	See specific years and notes below	0	
2001	433	425	58	28	36	3	12	See specific years and notes below	15	
2002	626	499	87	72	23	7	23	See specific years and notes below	46	
2003	904	651	17	66	18	10	27	See specific years and notes below	26	
2004	869	571	62	21	13	19	11	See specific years and notes below	35	
2005	1,322	847	89	38	29	6	20	See specific years and notes below	80	
2006	990	655	55	21	7	0	35	See specific years and notes below	18	
2007	948	603	27	42	22	17	2	See specific years and notes below	69	
2008	1,437	690	38	39	10	30	24	See specific years and notes below	12	
2009	1,227	894	85	35	7	17	4	See specific years and notes below	59	
2010	1,352	1,037	49	11	2	26	16	See specific years and notes below	5	
2011	1,194	766	80	16	14	9	14	See specific years and notes below	7	
2012	1,072	758	44	17	4	8	15	See specific years and notes below	15	
2013	1,000	673	47	15	0	0	29	See specific years and notes below	2	
Column Total	13,390	9,634	824	458	198	159	272		389	
Total Observations on Multiple-Use Lands									24,935	
Mechanized Total				24,306	Non-mech Total		629			
Mechanized %				97%	Non-Mech %		3%			

Note 1: Motorized access counted as vehicles being used for **fishing only** in 1999. Counted as vehicles (not occupants) which under-estimates actual motorized visitors.

Note 1: Motorized access counted as vehicles being used for **fishing and hunting only** in 2000. Counted as vehicles (not occupants) which under-estimates actual motorized visitors.

Note 1: Motorized access counted as vehicles being used for fishing, hunting, sightseeing, picnicing, dispersed camping, rock climbing, and wildlife viewing not counted in other categories from 2001 forward. Counted as vehicles (not occupants) which under-estimates actual motorized visitors.

Note 2: Vehicles at hiking trailhead from 2001 forward are shown to demonstrate magnitude of use but are not counted because they are not visiting multiple-use lands.

Data Source: Capital Trail Vehicle Association

Our observations of recreationists on multiple-use public lands from 1999 through 2013 is summarized in the table above (yearly data sheets available upon request) and demonstrates that out of 24,935 observations, 24,306 recreationists or 97% of the visitors were associated with motorized access and multiple-uses. Additionally, of the total number of people visiting public lands, 39% (9,634 / 24,935) were associated with OHV recreation. **Furthermore, and most importantly, out of the 10,721 (9634 + 458 + 198 + 159 + 272) visitors that we observed**

using trails, 9,634 or 90% were OHV recreationists and 1,087 or 10% were non-motorized recreationists which includes mountain bikes which are a form of mechanized travel, Therefore, the use of trails is 8:1 motorized versus non-motorized and the use of all routes is 13:1 mechanized versus non-motorized. Therefore, nearly all (97%) of the visitors to public lands benefit from management for multiple-use and benefit from motorized access and mechanized recreational opportunities which are consistent with our observations. Therefore, 90% of the trail users are motorized and 94% when including mountain bikes which enjoy using the same trails. Therefore, in order to be reasonably responsive to the needs of the public at least 90% to 94% of the trails system and public land should be managed for multiple-uses including motorized access and recreation.

Response 7-166: See Response 4-1, 7-32, and 7-81.

Comment 7-167: Out of the 24,935 recreationists that were observed, 272 were hikers and all of the meetings were pleasant. We have not experienced any user conflict in 15 years of observations.

Response 7-167: Comment noted.

Comment 7-168: The National Recreational Trails Advisory Committee identified trail-user conflicts on multiple-use trails as a concern that needed attention. The Committee worked with the Federal Highway Administration to produce a report (https://scholarsbank.uoregon.edu/xmlui/bitstream/handle/1794/9849/GV_191.67_T7M66_1994.pdf?sequence=1) to promote a better understanding of trail conflict, and identify approaches for promoting trail-sharing. The goal of the report was to promote user safety, protect natural resources, and provide high-quality user experiences. It reviews management options such as trail design, information and education, user involvement, and regulations and enforcement. The report found very sound ways to promote cooperation and understanding among trail users and presented ideas that will help reduce conflict on multiple-use trails. The report provides 12 principles for minimizing conflicts on multiple-use trails and we ask that each of these principles be incorporated into the travel management plan.

Response 7-168: See Response 4-1, 7-32, and 7-37.

Comment 7-169: Based on Southern Recreation Report estimates that 31.1% of the visitors are OHV recreationists, the total number of OHV related visits to the Uinta Wasatch Cache National Forest is 2,523,454 (8,114,000 x .311) (see NVUM citation for total number of forest visitors above). Given the 579 miles of existing motorized trails, there are 4,358 (2,523,454 / 579) OHV visitors per mile of motorized trail or 1 OHV visitor every 1.21 feet. Given the 1526 miles of non-motorized trail and 207,000 wilderness visitors, there are 136 (207,000 / 1526) non-motorized visitors per mile of trail or 1 non-motorized visitor every 39 feet. This imbalance of opportunity cannot be considered equal program delivery and the proposed action must address this significant issue by creating more motorized trails.

Response 7-169: See Response 4-1. The data presented describes recreation use for the entire Uinta-Wasatch-Cache National Forest. Chapter 3 describes the current condition for motorized

and non-motorized recreation and trails specific to the Ogden Ranger District project area. The Ogden Travel Plan FEIS and draft SEIS describe and analyze the impacts of a range of alternatives for motorized and non-motorized recreation.

Comment 7-170: The Government Accountability Office (GAO) report on OHV recreation has been prepared and released to the general public (<http://www.gao.gov/Products/GAO-09-509>). GAO investigators interviewed agency personnel, OHV rider and industry representatives and environmental group representatives. GAO issued a number of findings in terms of OHV recreation on public lands. GAO highlights include that OHV recreation is growing in popularity and that more Americans are seeking access to federal public lands via their OHVs. Second, the report found that the federal land agencies could do a better job of providing signage and general outreach to the recreating public so that visitors to public lands have a better understanding of where they can and cannot ride their OHVs. The report also focused attention on the inadequacies of law enforcement and the inconsistent scale of fines and penalties for inappropriate behavior on public lands. GAO found that the land agencies were stretched, both in terms of financial resources and personnel, and that other pressing concerns, such as fighting wildfires, apprehending drug criminals and border control issues kept agency personnel from devoting the necessary time to make public lands more accessible to recreation visitors. GAO looked into the issue of environmental damage caused by OHVs and found such damage is far less than some observers believed to be the case. Another finding was that agency personnel worked well with OHV user groups on trail maintenance projects. The report's conclusions confirm what we have known for a long time about OHV recreation on public lands and provide further reason to continue working on our priority issues. Motorized recreationists will continue to carry on our efforts to support law enforcement reform legislation as well as seek additional funding for better signage, maps and trail maintenance. Working with the Congress and our land agencies, we can create an environment where OHV recreation can continue to grow in popularity as more American families look to explore and enjoy the great outdoors.

Response 7-170: See Response 4-1, 4-3, 7-32, 7-37, 7-55, and 7-97. Thank you for your comment. The Ogden Travel Plan FEIS and draft SEIS describe a range of Alternatives in response to the purpose and need. As identified in Table 1.6.1, significant issues were used to develop a range of alternatives; mental and physical health were not identified as significant issues.

Comment 7-171: The Forest Service must give a hard look at the impact of motorized closures on the human environment. Per CEQ guidance, NEPA documents are to be driven by significant issues. Motorized closures and the lack of adequate motorized opportunities have a significant impact on motorized recreationists. The impact of motorized closures on the health of our members and the loss of the benefits of OHV recreation are significant issues to motorized recreationists. In order to make a reasonable decision, the Forest Service must adequately considers the issues and impacts associated with motorized closures on the mental and physical health of the public. These issues are critical due to the cumulative effect of all motorized closures. As one example, consider the motorized closure of the Scratch Gravel Hills near Uintah-Wasatch-Cache. Members of our group collected over 300 signatures on a petition protesting that closure. Many of the signatures were from high school students. Now there is no place close to Uintah-Wasatch-Cache that young people can go. What are they doing now? It is

not as positive as riding their dirt bike or ATV in the hills. Now multiply that by the thousands of miles of roads and trails that have been closed to the public. The following health issues and benefits of OHV recreation must be addressed in order to arrive at a reasonable decision for this action.

- a) Sadly, one indicator of the condition of the human environment in Idaho is the suicide rate. Utah ranks number 9 in the nation (<http://www.suicide.org/suicide-statistics.html>). This significant problem has been specifically identified as requiring special attention by everyone. Motorized recreation is popular and it is a very healthy and positive human activity that can help address this significant human issue (<http://www.marketwire.com/press-release/The-Results-Are-in-Off-Road-Vehicle-Riding-is-Good-for-Your-Body-and-Soul-1310189.htm>). The Forest Service can help address this significant problem by providing an adequate quantity and quality of motorized recreational opportunities. We ask that you adequately address this significant issue associated with the human environment.
- b) Videophilia - the new human tendency to focus on sedentary activities involving electronic media has become a significant social problem in the U.S. (Pergams, O. R. W. and P. A. Zaradic. 2006. Is love of nature in the US becoming love of electronic media? 16-year downtrend in national park visits explained by watching movies, playing video games, internet use, and oil prices. *Journal of Environmental Management* 80:387-393). The study shows that people in the US and other developed nations are spending far less time in nature than ever before. The study tested trends in nature participation in 16 time series in the categories of visitation to various types of public lands in the US, Japan, and Spain; number of various types of game licenses issued; amount of time spent camping; and amount of time spent backpacking or hiking. The four activities with the greatest per capita participation were visits to Japanese National Parks, US State Parks, US National Parks, and US National Forests, with an average individual participating 0.74-2.75 times per year. All four are in downtrends and are losing between 1% and 3% per year. The longest and most complete time series show that these declines in per capita nature participation typically began between 1981 and 1991, are losing about 1% per year, and have so far lost between 18% and 25%. At the same time, the interest and desire to participate in OHV recreation in the outdoors is increasing and strong as previously documented. OHV recreation is a reasonable alternative to increase participation in outdoor activities and we request that this issue and solution be adequately addressed by this plan by implement more OHV opportunities.
- c) In the past 30 years, the prevalence of overweight and obesity has increased sharply for both adults and children. Between 1976–1980 and 2003–2004, the prevalence of obesity among adults aged 20–74 years increased from 15.0% to 32.9%. This increase is not limited to adults. Among young people, the prevalence of overweight increased from 5.0% to 13.9% for those aged 2–5 years, 6.5% to 18.8% for those aged 6–11 years, and 5.0% to 17.4% for those aged 12–19 years. (Reference: <http://www.cdc.gov/nccdphp/dnpa/obesity/>). This disturbing trend has prompted the President to promote a health and fitness initiative (<http://www.whitehouse.gov/infocus/fitness/toc.html>) and OHV recreation is an activity that meets the physical requirements of the President's fitness program and counters the epidemic of videophilia.

- d) Research by the Ontario Federation of Trail Riders studied 310 off-road motorcycle enthusiasts and found that the physical exertion was on the order of 60% of VO₂max, or 80% HRmax, or 9.3 METS which is slightly greater than jogging (Characterizing the Physical Demands of Off-Road Motorcycling, Executive Summary, Jamie Burr, Norman Gledhill, Veronica Jamnik, Ontario Federation of Trail Riders, February 2007, http://www.oftr.org/OFTR_Fitness_Study.pdf).
- e) The July 2010 issue of Medicine & Science in Sports & Exercise, the Official Journal of the American College of Sports Medicine (ACSM), “Physiological Demands of Off-Road Vehicle Riding”) focuses specifically on the physiological demands of off-road vehicle (OHV) riding, compares them to the demands of other recreational activities, and explores the health and fitness benefits that OHV participation can provide (<http://www.nohvcc.org/Tools/TopicLibraries/Health.aspx>). The study concluded that the health benefits of OHV recreation include:
- Off-road vehicle riding was found to require “a true physiological demand that would be expected to have a beneficial effect on health and fitness according to Canada’s current physical activity recommendations”.
 - Off-road vehicle riding was determined to be a recreational activity associated with moderate-intensity cardiovascular demand and fatigue-inducing muscular strength challenges, similar to other self-paced recreational sports such as golf, rock-climbing and alpine skiing.
 - Oxygen consumption, which is an indicator of physical work, increased by 3.5 and 6 times the resting values for ATV and ORM riding respectively – which falls within moderate intensity activity according to the American College of Sports Medicine guidelines and is in line with Canadian physical activity recommendations.
 - The duration of a typical ride (2-3 hours for ATV, 1-2 hours for ORM) and the frequency of the rides (1-2 times a week) create sufficient opportunity to stimulate changes in aerobic fitness which falls within the physical activity guidelines (American College of Sports Medicine recommends between 450 – 720 MET minutes per week).
 - Using heart rate measurements alone, the demands of riding belong to the category of “hard” exercise – this increase of intensity may be linked to heightened psycho emotional responses (i.e. adrenalin), an effect of heat stress while riding, or a response to repeated isometric squeezing of the handlebars.
 - When considering muscular force and power involvement, study results indicate a greater impact on muscular endurance as opposed to an increase in strength.
 - Off-road vehicle riders perform considerable physical work using their arms and upper body. This upper body strength requirement “could lead to beneficial training increases in musculoskeletal fitness”.

- Study findings also picked up on the psycho-social effects of riding – the “enhanced quality of life and stress reduction effects of off-road riding”.
- Findings also reflect the importance of alternative physical activity such as off-road riding to promote physical activity in a group who might otherwise forego exercise altogether.

We ask that the tremendous value of OHV recreation for both mental and physical health benefits be recognized in the evaluation and used to justify an increase in motorized recreational opportunities.

F. Research by a leading neuroscientist has determined that riding a motorcycle helps keep riders young by invigorating their brains. The brain functions was measured by devices put on the heads of 22 males while riding motorcycles. The researchers found that the riders brains prefrontal areas became highly activated. This is the area of the brain that covers memory, information processing and concentration functions. The research was conducted by Ryuta Kawashima, the scientist behind popular "Brain Training" computer software at Nintendo.

One experiment involved 22 men, all in their 40s and 50s, who held motorcycle licenses, but had not taken a ride for at least a decade. They were randomly split into two groups. The first group was asked to resume riding motorcycles in everyday life for two months, the other group was asked to kept driving their cars or trucks. "The group that rode motorbikes posted higher marks in cognitive function tests," Kawashima said.

Another test, required the men to remember a set of numbers in reverse order, “the riders' scores jumped by more than 50 percent in two months, while the non-riders' marks deteriorated slightly,” said Kawashima. It should also be noted that the riders in the study mentioned that they made fewer mistakes at work and felt happier. "Mental care is a very big issue in modern society," says Kawashima . "I think we made an interesting study here as the data shows you can improve your mental condition simply by using motorbikes to commute.” The study goes on to display that a motorcycle rider's brain becomes more tense and is in a heightened alertness in order to process information actively during riding. The obvious payoff is that riding a motorcycle helps keep riders young by invigorating their brains.

http://www.dijtokyo.org/events/SMP_DAY1_Kawashima.pdf

<http://motocrossactionmag.com/Main/News/MOTORCYCLES-MAKE-YOU-SMARTER-Japanese-Study-Discov-5756.aspx>

We have observed that the same benefits that Kawashima has documented for motorcyclists also extends to all OHV recreation. We ask that the tremendous value of OHV recreation for both mental and physical health benefits be recognized in the evaluation and used to justify an increase in motorized recreational opportunities.

Response 7-171: See Response 4-1, 4-3, 7-32, 7-37, 7-55, and 7-97. Thank you for your comment. The Ogden Travel Plan FEIS and draft SEIS describe a range of Alternatives in response to the purpose and need. As identified in Table 1.6.1, significant issues were used to develop a range of alternatives; mental and physical health was not identified as a significant issue.

Comment 7-172: The positive economic impact on the economy of the area is another socio-economic factor that must be adequately considered in the decision-making and especially during this times of economic recession. Arizona State Parks has prepared a good example of an economic analysis of OHV recreation for Coconino County, AZ (http://www.gf.state.az.us/pdfs/w_c/OHV%20Report.pdf). The economic impacts of OHV recreation in one county are significant with \$258.3 million statewide impact and a \$215.3 million impact locally that supports 2,580 jobs. Off-highway vehicle recreation activity is an immensely powerful part of the Arizona collective economic fabric, generating nearly \$3 billion in retail sales during 2002 (http://www.gf.state.az.us/pdfs/w_c/OHV%20Report.pdf).

Response 7-172: See Response 4-1. The analysis in the FEIS and draft SEIS is limited to significant issues and economics was not considered.

Comment 7-173: There are 17 references to climate change in the NOI for the forest planning rule (http://fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5110264.pdf). Climate change is mentioned far more than any other issue. This apparent focus is not balanced with objective science and the needs of the public. The existence of climate change and any positive or negative impacts are simply not known at this time. There are many in the scientific community that support this position (<http://www.sepp.org/Archive/NewSEPP/LttrtoPaulMartin.html>, http://sciencepolicy.colorado.edu/admin/publication_files/resource-2803-2010.06.pdf, <http://www.climatewatch.org>, <http://epw.senate.gov/speechitem.cfm?party=rep&id=263759>). The climate has always been changing. Twelve thousand years ago North American was covered by ice. Before that dinosaurs roamed the area in a humid climate. The planning rule should not create impacts on the human environment because it “presumes” that the climate is changing any more or less than it always has. The planning rule must be based on extensive long-term credible scientific study. The quality of people’s lives cannot be compromised by a ghost issue without adequate basis. We only get one shot at this life and we want to experience the positive benefits of OHV recreation. Extensive long-term credible scientific conclusions on climate change do not exist at this time and, therefore, it would be unreasonable to make any assumptions about climate change and use those assumptions to impose any impacts on the human environment including motorized recreation in the planning rule.

Additionally,

- Global temperatures are not warming. Since 1998, global temperatures have decreased almost half a degree C.
- The average temperature in the US in 2009 was lower than every year since 1996 and lower than the overall average for the last 114 years.
- Manmade CO2 concentrations in the atmosphere are about 19 PPM (5% of 387 PPM overall CO2) which is 1 part in 51,680 total parts – in no way significant.

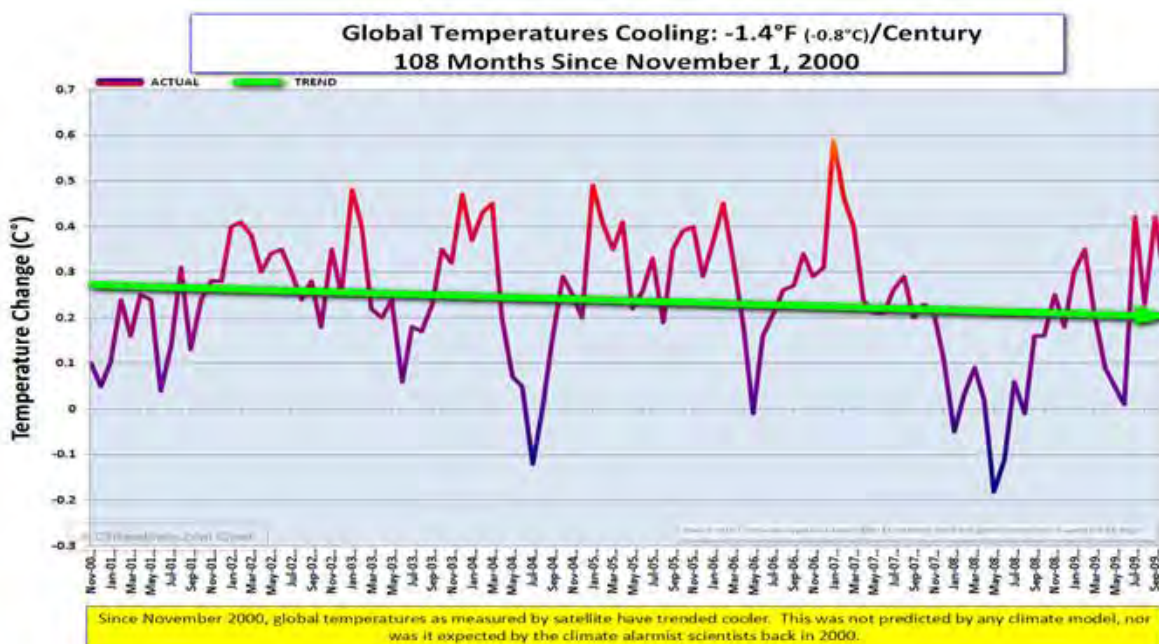
(Hydrogen cyanide gas is one of the most poisonous gases known to man and allowable working conditions for this gas in most of the US are 20 ppm. Carbon dioxide is harmless and actually helpful to plant life and total concentrations of it in the atmosphere by manmade causes are only 19 ppm. Carbon dioxide concentrations at present are near the LOWEST in geologic history.

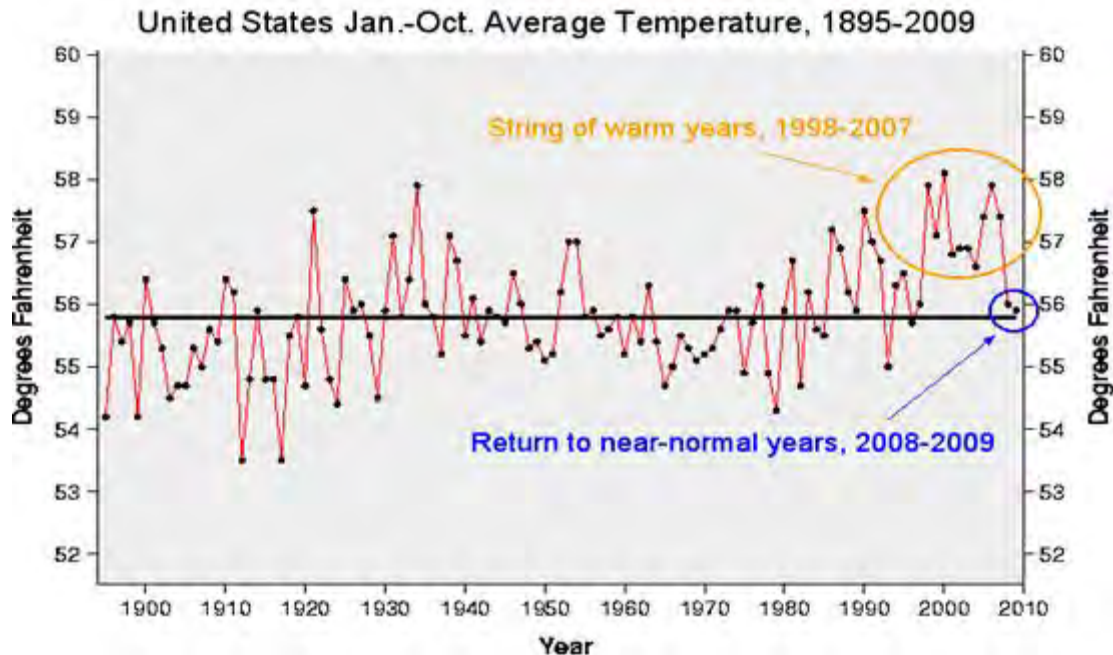
(<http://co2now.org/>)

- There is no statistical correlation between CO2 concentrations in the atmosphere and global temperatures. (Source: <http://www.drroyspencer.com/2010/01/december-2009-uah-global-temperature-update-0-28-degree-c/>)
- Global sea ice has increased by 200,000 square kilometers since 1980. (Arctic Sea Ice – down 900,000 Sq Km, Antarctica Sea Ice – up 1.1 Million Sq Km).

Global Sea Ice:		1980	2009
Southern Hemisphere	Antarctic	4.7	5.8
Northern Hemisphere	Arctic	15	14.1
Total	Global	19.7	19.9

- Polar bear populations are much higher today than they were 30 years ago. (<http://www.telegraph.co.uk/comment/columnists/christopherbooker/5664069/Polar-bear-expert-barred-by-global-warmists.html>)
- Over 95 % of the so-called “greenhouse effect” is caused by water vapor (evaporation of the oceans).
- There is no evidence that would purport that motorized recreation has a significant impact on the climate or climate change.





The average temperature in the US in 2009 was lower than every year since 1996 and lower than the overall average for the last 114 years.

Response 7-173: See Response 4-1. The analysis in the FEIS and draft SEIS is limited to significant issues and climate change was not considered.

Comment 7-174: Increasing levels of carbon dioxide have been blamed for a warming trend or climate change. Many studies have found that forest fires are a tremendous source of carbon dioxide. <http://www.sciencedaily.com/releases/2007/11/071101085029.htm> Why are forest fires with such a significant production of carbon dioxide acceptable and other sources not acceptable? Why aren't we doing more to proactively prevent forest fires and manage our forests?

Response 7-174: Comment is outside the scope.

Comment 7-175: Why do people persist in believing things that just aren't true? Research conducted by Brendan Nyhan, a professor of political science at Dartmouth and Lewandowsky professor at the University of Western Australia has concluded that it is when there's no immediate threat to our understanding of the world, we change our beliefs. It's when that change contradicts something we've long held as important that problems occur. If information doesn't square with someone's prior beliefs, he discards the beliefs if they're weak and discards the information if the beliefs are strong. Even when we think we've properly corrected a false belief, the original exposure often continues to influence our memory and thoughts. Strongly held beliefs continued to influence judgment, despite having the correction information and correction attempts—even with a supposedly conscious awareness of what was happening.

Response 7-175: Thank you for your comment.

Commenter 8: Bryce Lofthouse
Received: Email received November 9

Comment 8-1: I am writing in regards to the article that was in the standard examiner this week concerning the boxelder creek travel plan. I am conflicted about the idea of opening it up to motor vehicle use. It is a nice area to hike although it is under utilized. I often hike there and I rarely see anyone. I also hunt elk there and it has been productive. Brigham city does indeed have a spring there, and there are rumors of developing precipice spring. From the top down. If that happens that would require the building of an actual road. I agree with your position of being unable to enforce the current closure because of access from state land. I would support opening of the area for motor vehicles, despite knowing what it would do to my hunting area. There are currently several trails on the ground. I would also support opening some of the single track trails to motorcycles. I see some use by horses. There would be issues with search and rescue getting to accident sites, but that would be no different that it is now. That is the risk that we as outdoorsmen and adventurers take. There is one other trail in the area I would support opening to motor vehicles. It is located on the main road it follows the ridge south east along the county line. 1.5 miles from the main road there is a turn off that drops into north fork canyon. The trail is on the ground and with a little work it could be put back in service. I would support opening that trail to the bottom of that canyon, no further than that though. Opening that trail would allow greater access to north fork canyon. Now if someone wants to access north fork canyon they have to hike, and it is brutal. I am in good shape and I dread my hikes into and out of north fork canyon.

Response 8-1: Thank you for your response. The draft SEIS responds directly to a court order that identified three deficiencies in the previous EIS. The court specified that “the Forest Service evaluated an adequate array of alternatives....and should not be compelled to consider...proposed possibilities...” As it stands, Chapter 2 identifies a range of alternatives for motorized use within the Box Elder Creek area and environmental effects are described in Chapter 4. See Response 4-3 regarding enforcement.

Commenter 9: Jock Glidden
Received: Email received November 11, 2014

Comment 9-1: I understand you are considering opening access to the Box Elder area by ORV's in the new Travel Plan. If off-road motor vehicle access was prohibited back in 2002 because they caused excessive erosion and general terrain destruction, what is to prevent the same effects again if the USFS reopens it to ORV's? Wont the same reasons for closing it then be valid for keeping it closed now? Apart from political pressures, it seems that environmental reasons still apply. The principles of erosion and mental short-sightedness hold true universally and timelessly.

Response 9-1: Thank you for your comments.

Commenter 10: United States Department of the Interior, Office of the Secretary
Received: Letter dated and received via email on October 14, 2014

Comment 10-1: The U.S. Department of the Interior has reviewed the Second Draft SEIS Supplement Environmental Impact Statement (DRAFT SEIS), US Forest Service (USFS), Ogden Ranger District Travel Plan Revision, Wasatch-Cache-National Forest, Box Elder, Cache, Morgan, Weber and Rich Counties, Utah, and has no comments on the document.

Response 10-1: Thank you for your response.

Commenter 11: Joseph Wellington Smith
Received: Office Visit on September 17, 2014

Comment 11-1: Family owns land in the Devils Gate Valley near Mantua, Utah. They are tired of the ATV riders on his property and want all roads closed, including County roads. They are tired of the Federal agencies allowing and promoting access to his private property. This includes horses and hikers coming from North Fork Park. He marks his property and people tear down his markings and move boulders. He cannot speak for the entire Smith Family.

Response 11-1: Thank you for your response. You can be assured that the USDA Forest Service does not promote any form of private property use. This Record of Decision, based on the FEIS analysis, did close routes from the Willard Mountain Road 20084 to his property since no public right-of-way existed for the ATV trail locally known as the County Line trail.

Commenter 12: Albert Warner
Received: Office Visit on October 27, 2014

Comment 12-1: Block off road above the switchback going east along the County Line.

Response 12-1: Thank you for your response. See Response 11-1 concerning the County Line trail.

Appendix F

Ogden Travel Plan Implementation Status as of March 7, 2012

Curtis Creek Analysis Area						
Name	Route	Mileage	Route Disposition	Designation	Map Coord	Done?
Laketown Spur 1,2	26717, 26718	1.3 mile	These roads will remain closed to motorized use. This road was proposed to be open in the DEIS but the adjacent land is private and a public right-of-way not known to exist.	Closed to Motorized Use	D1	Yes
Nick Reservoir	26979	0.9 mile	This route will be managed as administrative use only. The northern route will be retained because of existing infrastructure in the roadway. It will be gated and the southern route will be ripped and seeded.	Administrative Use Only	E2	No
North Gorge Canyon	20213, xxx3	0.7 mile	The eastern segment (20213) will remain as open road. The western segment will be closed and reclaimed.	20213 Open xxx3 Close and reclaim	C1, D1 C1, D1	Yes
Otter Creek private	xx36	0.45 mile	This low standard road will be signed closed on both ends and managed for administrative use only road.	Administrative Use Only	E1	No
Longhurst Spring	26980	2.7 mile	This low standard road on a dry ridgeline will be managed for administrative use only with a gate installed at the forest boundary.	Administrative Use Only	E2	Yes
Red Spur Electronic Site	20205	1 mile	This road will be managed as open to motorized use. This road was proposed to be gated for administrative use only in the DEIS. A new gravel source will be developed along this road.	Open to Motorized Use	D3	Yes
Campground Spring	20082	0.2 mile	This short road ends at a dispersed campsite and will be managed as open to motorized use.	Open To Motorized Use	D3	Yes
Spencer Basin Gated	20103	3.74 miles	This road will continue to be managed as an administrative use only road.	Administrative Use Only	D4	Yes
Baxter Sawmill 2	26994	1.1 mile	This road will be managed as a new open road but it will be gated and closed seasonally from approximately November 15 to June 15 to improve elk habitat.	Open to Motorized Use With Seasonal Closure Nov 15 to June 15	B3B4	Yes
Baxter Ridge	26714	0.9 mile	This road will be managed as a new open road.	Open to Motorized Use	C3	Yes
Curtis Private	20074	0.49	This road will continue to be managed	Administrative	C3	Yes

		mile	as an administrative use road.	Use Only		
Curtis Ridge Trail	6309	2.2 mile	This existing trail will be brought up to standard and managed as a new motorized ATV trail.	New Motorized Trail	D4	No
Six Bit Spring	20144	2.2 mile	The eastern extent of this road will be gated and open to administrative use only.	Administrative Use Only	D4	Yes
Valley Ridge North	xxx1	0.2 mile	This is an existing road that connects the Dry Fork (29162 Road to BLM property to the east. It will be added to the Forest Service system as an open maintenance level 2 road.	Open to Motorized Use	E4	Yes
Dry Canyon	26983	0.53 mile	This road will be gated at the Forest boundary and open to administrative use only.	Administrative Use Only	E3	Yes
Pole Hollow	26109	1.4 mile	This road is open on the current Travel Plan but will be managed as an administrative use only road.	Administrative Use Only	E4	Yes
Dry Fork	20162	2.11 miles	This road was open on the previous Travel Plan. It is in poor condition and will be closed.	Close Road and Reclaimed	E4	Yes
Arbs Dispersed	20057	0.15 miles	This is a short road that ends at a group of dispersed campsites. The road will be added as a new open road to provide access to the dispersed camping sites.	Open to Motorized Use	C6	Yes
Arbs Private	26724	1.64 miles	This existing road will be managed as an open road.	Open To Motorized Use	C7	Yes
Walton Gulch	xxx7	0.12 miles	This road is open on the existing travel plan but it is not a system road. It is a main route connecting the Curtis Ridge Road (20059) to BLM lands to the east. It will be assigned a road number.	Open To Motorized Use	C6	Yes
Davenport Hollow	20196	4.12 miles	The majority of this road is open to motorized use on the existing Travel Plan. The existing gate will be moved north and the existing road will be managed as a new motorized trail (1.1 miles) to where it connects to the new Tilda Spring 3 Extension (XXX4).	Existing Road and New Motorized Trail	B6B7	No
Davenport Hollow Overlook	xxx8	1.12 miles	This route is an extension of the Davenport Hollow road (20196). It will be managed as a non-motorized trail.	Closed to Motorized Use	B6	No
Buck Spring Road and realignment (0.25 mile)	20197	2.14 miles	This existing road will have a minor realignment (.25 mile) away from the Buck Spring Pond for protection of the aquatic habitat. The Buck Spring Road	Minor Realignment	B7	Yes

			will be gated at the private property line.			
Dry Gulch Dispersed	20028	0.3 miles	This existing road will remain open to provide access to dispersed campsites. The segment west of the dispersed sites (approximately .3 mile) will be closed and reclaimed.	Close and Reclaim	C4	No
Zion Spring	20221	1.9 miles	The existing road will remain open to provide access to dispersed camping sites (approximately .2 mile). The segment west of the dispersed camping sites (approximately 1.9 mile) will be gated and managed as administrative access only.	Administrative Use Only	C5	Yes
Tilda Spring 3 Extension	xxx4	0.7 miles	This is a new ATV trail that will be built to link the Tilda Complex to the Davenport Hollow Road (20196).	Open to Motorized Use	A6B6	No
Boundary Spring ATV Trail and Realignment (0.15 mile)	26736	1.1 mile	The spring will be protected from motorized vehicle use by building a reroute west side of the pond. This 0.15 mile segment will be managed as part of the Boundary Spring ATV trail. The abandoned section will be reclaimed.	Minor Realignment	A6	Yes
Big Crawford Creek 1,2,3	26704, 26705, 26706	1.36 mile	These roads are currently open on the existing Travel Plan and will be closed to public use and reclaimed.	Close and Reclaim	D5	No
Crawford Creek 1	26989	0.9 miles	This closed road will reclaimed.	Close and Reclaim	D5	No
Bob Kiddys hole	26707	0.2 mile	This existing road will be designated as open to public use to provide access between BLM and SITLA lands.	Open to Motorized Use	E5	Yes
Monte Cristo and Wheat Grass Analysis Area						
Name	Route	Mileage	Route Disposition	Designation	Map Coord	
Blake Hollow	20198	4.7 mile	Not open on the current Travel Plan. It will be managed as an administrative use only to provide access to a gas pipeline corridor.	Administrative Use Only	C1	Yes
Monte Cristo Pit Dispersed	20112	0.1 mile	This existing road will be managed as open to provide access to an existing gravel pit and private land to the north.	Open to Motorized Use	D1	Yes
Eli Ridge	20202	1.6 mile	A portion of the existing road will be managed as an open road to provide access to dispersed camp sites (approximately 4. mile).	Open to Motorized Use -- .4 Mile Administrative	C2D1 C2D1	Yes

			The segment beyond the dispersed sites will be managed as administrative use only (approximately 1.2 mile).	Use Only –1.2 Mile		
Dairy 2	26732	0.5 mile	This existing road will be managed as a new open road to provide access to the new Dairy 2 gravel source.	Open to Motorized Use	E2	Yes
Sylvia Overlook	26712	0.8 mile	This existing road will be managed as a new open road to provide access to an overlook and dispersed campsites.	Open to Motorized Use	C2	Yes
Baldy Ridge	26708	0.4 mile	This existing road will be managed as open with a seasonal closure and be managed in conjunction with the Baldy – Wheeler Creek Road (20071). It will remain gated at its intersection with private land to the east.	Open to Motorized Use with Seasonal Closure	E2	Yes
Monte Cristo Peak	20066	0.27 mile	This road will continue to be managed as an administrative access to the permitted electronic site.	Administrative Use Only	C2	Yes
Dairy Wash ATV Trail	xx14	1.07 miles	This is a new ATV trail to be built near State Highway 39 to connect Dairy Ridge road and Wasatch Ridge roads.	Open to Motorized Use	C2	No
Harriet Spring 1	xx35	0.2 miles	A short section of this road from SR 39 to dispersed camps will be managed as open to motorized use.	Open to Motorized Use	C2	Yes
Harriet Spring 2	xx37	0.09 miles	A short section of this road from SR 39 to dispersed camps will be managed as open to motorized use.	Open to Motorized Use	C2	Yes
Harriet Spring 3	xx38	0.17 miles	A short section of this road from SR 39 to dispersed camps will be managed as open to motorized use.	Open to Motorized Use	C2	Yes
Wasatch Dispersed	26733	0.8 mile	This road will be managed as a new open road to provide access to dispersed camp sites and a water development.	Open to Motorized Use	C2C3	Yes
Wasatch Hunting Camp	20222	0.08 mile	This road will be managed as a new open road to provide access to dispersed camp sites and a water development.	Open to Motorized Use	D3	Yes
Dry Mitchell ATV trail	xx13	1.78 miles	This is a new ATV trail that will be built to connect Dry Bread Dispersed area (20166) to Mitchell Hollow ATV trail (6619).	New Motorized Trail	B2	Yes
Dry Bread ATV	6324	0.76 mile	The open ATV trails shown on the Travel Plan map are incorrectly drawn and will be corrected.	Map Correction	B2	Yes

Dry Bread Loop trail	xx11	0.4 mile	Approximately 0.3 mile of this route exists on the ground and will be added to the system as a motorized trail. Approximately 0.1 mile of new motorized trail will be built to provide a better highway crossing to access the Dry Bread area.	Open to Motorized Use	B3C2	No
Dry Bread Upper	20107	1.4 mile	This is an existing classified road that will be managed as a new motorized trail.	New Motorized Trail	B3C3	No
Powerline Overlook	26019	0.15 mile	This is a system road that will be managed as open to motorized use.	Open to Motorized Use	C2	Yes
Powerline Spur	26711	0.43 mile	This road will be managed as open to motorized use to provide access to dispersed camping sites.	Open to Motorized Use	C2	Yes
Blue Bell flat	20201	1.1 mile	The final 0.4 mile of this road will be closed and managed as a part of Blue Bell Springs trail (6099). A permanent barrier will be built at the existing gravel pit.	Close and Reclaim	C3	Yes
South Fork Analysis Area						
Name	Route	Mileage	Route Disposition	Designation	Map Coord	Done?
Camp Red Cliffe	20191	1.13 mile	This road will be gated and managed as an administrative use only road. The new or relocated gate will be located at the junction of the Lower Meadows Campground road (20076). The gate and road will be included in the three Special Use permits that use this road (Camp Red cliff, Camp Beaver, Jones road use).	Administrative Use Only	F1	No
Ogden Front and Pineview Reservoir Analysis Area						
Name	Route	Mileage	Route Disposition	Designation	Map Coord	Done?
Skyline Trail	6001	19 mile	The north portion from North Ogden Divide to Inspiration Point (10.5 miles) will be seasonally closed to motorized use from mid-November until July 15th each year. The portion from North Ogden Divide south will continue to be managed as a single track motorized trail no seasonal closure.	New Seasonal Closure	A1A2B3C4	Yes
Uintah Highlands Water System	xx22	0.58 mile	Manage as an administrative use only road. It is a spring development road currently permitted on National Forest.	Administrative Use Only	A7	Yes

Willard and Public Grove Analysis Area						
Name	Route	Mileage	Route Disposition	Designation	Map Coord	Done?
Willard Mountain	20084	11.8 mile	This is an open, system road. A gate will be installed just past Grizzly Peak Road (20091) for a seasonal closure from approximately November 15 th until June 15th to protect wildlife habitat (approx 4 miles).	New Seasonal Closure	C2 B3 B4	Yes
Dock Flat Complex	26010	4.4 mile	This road consists of more than one route section. A) The western section will be permitted to Brigham City for spring developments access. This section will also be open as an ATV trail that follows Box Elder Creek south towards Black Mountain. B) Dock Flat will have two distinct groups of dispersed campsites and associated access roads open to motorized use on either side of the Willard Mountain Road (20084).	A) Admin. Use Only and New Motorized Trail(approx4.2 miles) B) New Open Road approx. 0.2 miles)	B2C2 B2C2	Yes
Upper Dock Flat	xx29	0.23 miles	Existing road to be added to the system to be managed as open to motorized use to provide access to dispersed camp sites.	New Open Road	C2	Yes
Devils Hole Canyon ATV trail	xx30	1.8 miles	This is a new ATV trail to be built north of the Willard Mountain Road and will connect Dock Flat to the Mantua Church Camp road (xx31).	New Motorized Trail	C2	Yes
Pete's Hollow Trail	26022	2.37 mile	This existing route will be managed as a single track motorized trail from the junction with Box Elder Creek ATV trail (xx34) to the Forest boundary. The trail will be seasonally closed to coincide with the Brigham Face Wildlife Management Area.	New Single Track Trail With Seasonal Closure	B2	No
Mantua Church Camp (west portion)	xx31	0.57 mile	This is an existing road that will be assigned an inventory number and managed as a seasonally open road. A temporary gate was installed to close this route at the junction of the Willard Road but allow the Church Camp users access. This road is also a Box Elder County road.	New Open Road	C2	Yes

Mantua Church Camp (east portion)	xx31	0.22 mile	This road will be managed as described in the west portion. A new gate will be installed to close this route from approximately November 15th to June 15th. It is on an isolated parcel between Willard and Public Grove that was acquired by the National Forest in 1999. This road is also a Box Elder County road.	New Open Road with Seasonal Closure	C3	No
Box Elder Creek ATV trail	xx34	1.24 miles	This is a new ATV trail to be built that will connect the Dock Flat Complex (26010) to the Willard Mountain road (20084) near Perry Reservoir.	New Motorized Trail	B3	No
Perry Reservoir	20070	0.18 miles	This road will managed as an administrative use only road.	Administrative Use Only	B3	Yes
Grizzly Peak 4x4	20091	1.49 mile	This road will be closed to motorized use. Either a gate or a natural barrier will be built at the beginning.	Close and Reclaim	B3	Yes
West Fork Willard Canyon ATV Trail	6323	1.51 mile	This route will be closed to motorized use.	Close and Reclaim	A4B4	Yes
Inspiration Point Trail	6091	0.4 mile	This trail will be managed as a single track motorized trail with a new short re-alignment (>0.1 mile) to connect to the Skyline Trail (6001).	New Motorized Trail	B4	No
Willard Lake Trail	6090	0.8 mile	This route will be closed to motorized use.	Close and reclaim	B4	Yes
Sink Hole Loop	26012	0.84 mile	This existing road will be managed as a new open road with seasonal closure. This route will not be opened to public use until all seasonal gates are installed on both ends.	New Open Road with Seasonal Closure	D1	Yes
Three Mile	20113	3.0 mile	This road is managed as open on the current Travel Plan. It will be gated and seasonally closed from approximately November 15th to June 15th.	New Seasonal Closure	D2	Yes
Public Grove 4x4	20220	4.47 miles	This existing route will be managed as a new motorized trail with seasonal closure. This new route will incorporate a segment of unauthorized road that extends to the Forest boundary (see analysis area map).	New Motorized Trail with Seasonal Closure	E3E4	Yes
Public Hollow loop 4x4	20092	1.8 mile	This road is open on the Travel Plan. The northern portion is seasonally closed from November 1 to June 15th.	Open Road with Seasonal Closure	E3E4	Yes

			The southern portion will remain closed to motorized use.			
Jensen Ranch 4x4	20114	0.41 mile	This road will be gated and managed as an administrative use only.	Administrative Use Only	E3E4	Yes